

DISTRIBUTION CENTER  
09 SEP 11 AM 7:32  
IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT IN AND FOR MIAMI-  
DADE COUNTY, FLORIDA

CASE NO: 08-33495 CA 11

090000-07

In Re:

LATIN NODE, INC.,

Assignor,

to:

MICHAEL PHELAN,

Assignee.

**NOTICE OF TAKING DEPOSITION DUCES TECUM**

**TO: John de Leon, Esq.  
Law Offices of Chavez & De Leon, P.A.  
5975 Sunset Drive, Suite 605  
South Miami, FL 33143  
[ldeleon@chavez-deleon.com](mailto:ldeleon@chavez-deleon.com)**

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of **Hondutel**, by an officer or director thereof on **September 17, 2009 at 12:00 Noon** at Ouellette & Mauldin, Court Reporters, The California Club, 1031 Ives Dairy Road, #228, North Miami Beach, FL 33179, upon oral examination before an Official Court Reporter, Notary Public or some other officer authorized under applicable statutes and/or rules of court to take depositions. The deposition will continue from day to day until completed. The deposition is being taken for the purpose of discovery, for the use at trial, or both of the foregoing, or for such other purposes as are permitted under the applicable and governing rules of Court.

The examinee is further requested to bring to the examination all of the documents described on the attached Exhibit "A".

**PLEASE ADVISE IF AN INTERPRETER IS NECESSARY.**

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Taking Deposition was e-mailed and mailed this 9<sup>th</sup> day of September, 2009 to the above-named addressee and served by U.S. Mail on the persons listed on the annexed Schedule.

GAMBERG & ABRAMS  
Attorney for Assignee  
Presidential Circle  
4000 Hollywood Boulevard, #350 N  
Hollywood, Florida 33021  
Telephone: (954) 981-4411  
Facsimile: (954) 966-6259

BY: \_\_\_\_\_

JAY M. GAMBERG  
Fla. Bar No.: 178235

DOCUMENT NUMBER-DATE

09385 SEP 11 8

FDCS-COMMISSIONER OF COUR

**EXHIBIT 'A'**

1. All documents establishing the validity of debts owed from Latin Node, Inc. To Hondutel, as follows:
  - a. Contracts
  - b. Correspondence, including e-mails, faxes and memoranda;
  - c. Invoices;
  - d; Evidence of payment from Latin Node, Inc. to Hondutel or any evidence of payment from Hondutel to Latin Node, Inc.
  
2. Records of equipment owned by Latin Node Inc. and given in any manner by Laton Node, Inc. to Hondutel.