

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO 951232-TI

In Re: Dade County Circuit Court referral of)	
certain issues in Case No. 92-11654 CA 11)	
(Transcall America, Inc. vs. Telecommunications)	NOTICE OF TAKING
Services, Inc. and Telecommunications Services,)	DEPOSITION
Inc. vs. Transcall America, Inc. and Advanced)	
Telecommunications Corp.) that are within the)	
Commission's jurisdiction.)	
)	

TO:

Albert T. Gimbel
Messer, Caparello & Self, P.A.
215 South Monroe Street, Suite 701
Tallahassee, Florida 32302-1878

Beth Keating Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32301

Kathy L. Welch, CPA
Regulatory Analyst Supervisor
Florida Public Service Commission
3625 N.W. 82nd Avenue, Suite 400
Miami, Florida 33166-7602

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition of

the following individual:

NAME	DATE AND TIME	LOCATION
Douglas Metcalf	August 12, 1998 10:30 a.m	Accurate Reporters 20 N Orange Avenue, Suite 407 Orlando FL 32801

DOCUMENT NUMBER-DATE

upon oral examination before an officer authorized by law to take depositions in the particular jurisdiction. The oral examinations will continue from day to day until completed. The deposition is being taken for the purpose of discovery, or for such other purposes as are permitted under the rules of Court, including the applicable Florida Rules of Civil Procedure

The witness shall have with him the documents on Exhibit A hereto

ADORNO & ZEDER, PA

Wesley R. Parsons

Florida Bar No 539414

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Attorneys for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 27 day of July, 1998 on the addressees

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cc: Accurate Reporters 800-886-9728

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EXHIBIT A

- 1. All documents concerning this action.
- 2. All documents on which you relied to formulate any opinion or reach any conclusion regarding this action or your testimony in this action.
- 3. All written communication between you and any person, including counsel, regarding this action or your testimony in this action.
 - 4. Your current Curriculum Vitae.
 - 5. A list of all publications authored by or co-authored by you
- 6. Copies of all publications authored by or co-authored by your which deal with the areas in which you expect to testify in this case.
- 7. All documents, exhibits, facts and materials representing or containing facts upon which you have relied or may rely in giving testimony in this case or which may be used to represent, illustrate or explain your testimony in this case.
- 8. Any reports, studies, data compilations, data bases, or other information of a statistical nature upon which you have relied or may rely in giving your testimony in this case.
- 9. Your entire file related to Telecommunications Services, Inc. and/or Joel Esquenazi.
- 10. Any and all materials you reviewed in this matter, including but not limited to, depositions, correspondence, photographs, reports, books, articles, literature, films, tests, experiments, statements, results of inspections, drawings, blueprints, or other reference material that you used or are relying on.
 - 11. Any and all reports you prepared or furnished in this area
 - 12. Any and all reports which were furnished to you by other experts in this case.
- 13. Any and all results of tests of any kind you, your agents, servants or employees conducted in this case.
- 14. Your complete billing file in this case, including, but not limited to, the charges you have rendered, the statements that you have rendered, the time spent on this case, and other relevant materials concerning the time and billings on this case

- 15. Any and all notes, writings, memoranda, etc., which you have prepared in this case.
- 16. Any and all computer printouts related to your retention in this case regardless of whether the printouts were generated by you, your agents, servants or employees, or by any other person or entity.
- 17. The computer program utilized to generate the computer printouts requested above.
- 18. Any and all notes taken or prepared and analysis performed by you or your agents, servants or employees which were prepared for this case.
- 19. Any and all publications or source materials which you have consulted and/or relied upon in this case.