

CAUSE NO. 22-00105

CSD VAN ZANDT LLC  
*Plaintiff*

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IN THE DISTRICT COURT

v.

294<sup>th</sup> JUDICIAL DISTRICT

UDO BIRNBAUM  
*Defendant*

VAN ZANDT COUNTY, TEXAS

**NOTICE OF INTENTION TO TAKE ORAL DEPOSITION OF UDO BIRNBAUM**

TO: Udo Birnbaum, located at 540 VZ County Road 2916, Eustace, Texas 75124.

PLEASE TAKE NOTICE that beginning at **10:00 a.m. on May 8, 2023**, Plaintiff, CSD Van Zandt LLC, will take the oral deposition of UDO BIRNBAUM in the above-entitled and numbered cause pursuant to the Texas Rules of Civil Procedure. The deposition will be taken via zoom and may be videotaped before a duly appointed court reporter. You are invited to attend and cross-examine the witness. The zoom information for this deposition is provided below:

<https://us02web.zoom.us/j/84841440631?pwd=QkZtbFp0NTdyK2lSS9jNVpoVURLUT09>

Respectfully submitted,

**FLOWERS DAVIS, P.L.L.C.**  
1021 ESE Loop 323, Suite 200  
Tyler, Texas 75701  
(903) 534-8063 Telephone  
(903) 534-1650 Facsimile

/s/ Katryna R. Watkins  
**KATRYNA R. WATKINS**  
State Bar No. 24106554  
[krw@flowersdavis.com](mailto:krw@flowersdavis.com)

**ATTORNEY FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify a true and correct copy of this document was served on Defendant via electronic service and emailed on this the 3<sup>rd</sup> day of May 2023.

/s/ Katryna R. Watkins  
**KATRYNA R. WATKINS**