

STATE OF INDIANA                    )     IN THE MONROE CIRCUIT COURT  
  )     )  
COUNTY OF MONROE                )     CAUSE NO. 53C06-2203-PL-000509

COUNTY RESIDENTS AGAINST ANNEXATION, INC.,  
an Indiana not for profit corporation, *et al.*

Remonstrators/Appellants/Petitioners,

v.

THE COMMON COUNCIL of the City of Bloomington,  
Monroe County, Indiana, *et al.*  
Respondents.

**NOTICE OF EXPERT DEPOSITION**  
**AND SUBPOENA DUCES TECUM**

**TO: Judith A. Sharp, Monroe County Assessor**  
**c/o William J. Beggs, Esq., Bunger & Robertson**

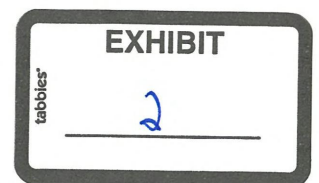
PLEASE TAKE NOTICE that Respondent City of Bloomington, pursuant to Rules 26 and 30 of the Indiana Rules of Trial Procedure, will take the deposition upon oral examination of **Judith A. Sharp**. The deposition will commence at **9:00 a.m. Eastern on Wednesday, February 14, 2024** and continue as necessary, at **Bloomington City Hall, 401 N. Morton Street, Room 225, Bloomington, Indiana 47404**. The deposition will take place before an officer authorized to administer oaths who will stenographically record the proceedings.

YOU ARE HEREBY COMMANDED, and pursuant to the Court's Amended Case Management Order, to produce the documents listed below no later than **Monday, February 12, 2024 at 9:00 a.m.**

**Definitions**

“You” or “Your” refers to Judith A. Sharp.

“Communications” means all forms of information transference written, oral or electronic, including without limitation meetings, conferences, conversations, discussions, proposals, solicitations, interviews, correspondence, messages, and notes, as well as memoranda and records



of Communications, including, but not limited to, text messages (SMS), emails, iMessages, voicemails, Facebook messages, social media internal messaging systems, and internal messaging programs.

**Documents**

1. Your complete file, documents, and non-privileged Communications in connection with this matter or annexation by the City of Bloomington.

WITNESS, the undersigned attorney of record, this 31<sup>st</sup> day of January, 2024.

/s/ Stephen C. Unger

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*Attorneys for Bloomington Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon the following persons electronically via the Indiana E-Filing system (IEFS) this 31<sup>st</sup> day of January, 2024:

William J. Beggs	<a href="mailto:wjbeggs@lawbr.com">wjbeggs@lawbr.com</a>
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*/s/ Stephen C. Unger* \_\_\_\_\_

Stephen C. Unger

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