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Attorney for Complainant

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EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
SAN FRANCISCO DISTRICT OFFICE
901 MARKET STREET, SUITE 500
SAN FRANCISCO, CA94013

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MARGARET O. TUNNELL,

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Complainant,

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v.

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FEDERAL DEPOSIT INSURANCE
CORPORATION,

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Agency.

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EEOC CASE NOS.: 370-AO-X2124 and 370-A1-X2103

AGENCY DOCKET NOS.: FDIC 000040 & FDIC 98-86

**NOTICE OF DEPOSITION
OF MICHAEL ZAMORSKI**

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TO THE AGENCY AND ITS ATTORNEY OF RECORD:

Please take notice that Complainant Margaret O. Tunnell, through her attorneys, the Law Offices of Mary Dryovage, will take the deposition of **MICHAEL ZAMORSKI**, upon oral examination before a certified court reporter. The deposition will commence on **Monday, June 4, 2001 at 1:30 p.m.** at the Law Offices of Mary Dryovage, 240 Stockton Street, 9th Floor, San Francisco, CA 94108 and will continue day to day thereafter until completed, weekends and holidays excluded.

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Please take further notice that Complainant Margaret O. Tunnell requests that this deponent bring to the deposition true and correct copies of the documents described in the attached Exhibit A.

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DATED:

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MARY DRYOVAGE
Attorney for Complainant

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1 **Exhibit A**

2 **DEFINITIONS AND INSTRUCTIONS**

3 The term "DOCUMENT" as used herein, is a broadly inclusive term referring to any and all
4 written or other graphic material, however produced or reproduced, of every kind and description and
5 to everything upon which sounds, words, symbols or pictures are recorded or depicted by magnetic or
6 electrical impulse, photography, or otherwise. The term "document" includes, by way of example and
7 not limitation, the following and anything similar to any of the following:

- 8 1. Letters, telegrams, facsimiles, emails, cables, memoranda, interoffice
9 correspondence and other forms of correspondence and written communication;
- 10 2. Agreements, contracts, policies, handbooks, practice guidelines, reports,
11 studies, records, books, journals, papers, statements, pamphlets, circulars, publications, stenographic
12 notebooks, files and their contents, file folders, file covers, file jackets, and notes;
- 13 3. Summaries, abstracts, indexes, tabulations, graphs, charts, lists and inventories;
- 14 4. Calendars, desk calendars, appointment books, schedules, logs, telephone
15 messages, diaries, time sheets, minutes of meetings, and transcripts;
- 16 5. Financial statements, checks, invoices and accounting records and books;
- 17 6. Pleadings, deposition transcripts, trial transcripts, interrogatories, answers to
18 interrogatories, affidavits, declarations, papers filed or lodged with courts, and papers filed with or sent
19 to administrative agencies.
- 20 7. Tape recordings, sound reproductions, objects, photographs, motion pictures,
21 microfilm, computer data, computer printouts, data processing cards or tapes, and computer disks or
22 diskettes.

23 D. If any document is withheld under a claim of privilege or other protection, please provide all of
24 the following information with respect to any such document, so as to aid the Court and the parties
25 hereto in determining the validity of the claim of privilege or other protection:

- 26 1. The identify of the person(s) who prepared the document and who signed the

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document, and over whose name it was sent or issued;

2 2. The identify of the person(s) to whom the document was directed;

3 3. The nature and substance of the document, with sufficient particularity to enable
the Court and the parties thereto to identify the document;

5 4. The date of the document;

6 5. The identity of the person(s) who has (have custody of, or control over, the
document and each copy thereof;

8 6. The identity of the person(s) to whom a copy of the document was furnished;

9 7. The number of pages of the document;

10 8. The basis on which any privilege or other protection is claimed;

11 9. Whether any non-privileged or non-protected matter is included in the
document

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DOCUMENTS REQUESTED

1. Any and all DOCUMENTS, including notes, memoranda, emails, either hard copies or emails
stored in memory, concerning your input in the decision making process of whether or not to select
Complainant Margaret O. Tunnell to the positions of Senior Case Manager (Vacancy No. 97-W-150)
and/or Assistant Regional Director (Vacancy No. 97-W-152).

2. Any and all DOCUMENTS, including notes, memoranda, emails, either hard copies or emails
stored in memory, reflecting or pertaining to any communication between you and any person at the
Agency regarding the selection process for the positions of Senior Case Manager (Vacancy No. 97-W-
150) and Assistant Regional Director (Vacancy No. 97-W-152).

3. Any and all DOCUMENTS referring or relating to the qualifications for the positions of Senior Case
Manager (Vacancy No. 97-W-150) and Assistant Regional Director (Vacancy No. 97-W-152).

4. Any and all DOCUMENTS referring or relating to any and all interviews conducted by anyone at
the Agency with Complainant Margaret O. Tunnell for the positions of Senior Case Manager (Vacancy

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No. 97-W-150) and Assistant Regional Director (Vacancy No. 97-W-152).

5. Any ~~and~~ all DOCUMENTS referring or relating to the policies and procedures for selecting candidates for the positions of Senior Case Manager (Vacancy No. 97-W-150) and Assistant Regional Director (Vacancy No. 97-W-152).

6. Any ~~and~~ all DOCUMENTS referring or relating to any and all interviews conducted with candidates other than Complainant Margaret O. Tunnell for the positions of Senior Case Manager (Vacancy No. 97-W-150) and Assistant Regional Director (Vacancy No. 97-W-152).

7. Any ~~and~~ all DOCUMENTS referring or relating to the reasons for the selection of David Promani, and Louis Cheng to the positions of Senior Case Manager (Vacancy No. 97-W-150) and Vanessa Villalba to the position of Assistant Regional Director (Vacancy No. 97-W-152).

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1 UNITED STATES OF AMERICA

2 EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

3 MARGARET O. TUNNELL,

4 Complainant,

v. 5

6 CHAIRMAN, FEDERAL DEPOSIT
INSURANCE CORPORATION,

7
8 Agency.

EEOC CASE NO.: 370-A1-X2103
EEOC CASE NO. 370-A1-X2103

Agency No.: FDIC 98-86
Agency No.: FDICEO 000040

CERTIFICATE OF SERVICE

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10 I am a citizen of the United States and have an office in the County of San Francisco; I am over
the age of eighteen years and not a party to the above-entitled action; my business address is 240
Stockton Street, 9th Floor, San Francisco, CA 94108.

11 On _____, I served the within NOTICE OF DEPOSITION OF MICHAEL
ZAMORSKI on the parties in said action by MAILING and FAXING a true copy thereof enclosed in
a sealed envelope, first class postage fully prepaid to the following address:

12 LAUREL P. REST
Corporate Affairs Counsel & Agency Representative
FDIC - Legal Department
25 Ecker Street, Suite 900
San Francisco, CA 94105

FAX 415 808 7956

13 I declare under penalty of perjury that the foregoing is true and correct and was executed on
14 _____, at San Francisco, California.

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