

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Chapter 11
	:	
Philadelphia Newspapers, LLC, et al.,	:	Case No. 09-11204 (SR)
	:	
Debtors.	:	Jointly Administered
	:	

NOTICE OF RULE 30(b)(6) DEPOSITION

**To: Philadelphia Newspapers, LLC, et al.¹
C/O Anne Marie Aaronson, Esquire
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-and-

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PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6) and Fed. R. Bankr. P. 7030 and 9014, the undersigned attorneys for Vahan H. Gureghian, Danielle Gureghian and Charter School Management, Inc. (“CSMI Parties”) will take the deposition upon oral examination of a corporate representative(s) 30(b)(6) designee of the Debtors on **September 1, 2010** commencing at **10:00 a.m.**, at the offices of Obermayer Rebmann Maxwell & Hippel LLP, One Penn Center, 19th Floor, 1617 John F. Kennedy Blvd., Philadelphia, PA 19103-1895. Pursuant to Fed. R. Civ. P. 30(b)(6), the

¹ The debtors jointly administered under case number 09-11204 (SR) consist of PMH Acquisition, LLC; Broad Street Video, LLC; Philadelphia Newspapers, LLC; Philadelphia Direct, LLC; Philly Online, LLC; PMH Holdings, LLC; Broad Street Publishing, LLC and Philadelphia Media, LLC, and Philadelphia Media Holdings, LLC (hereinafter, the “Debtors”).

Debtors shall designate one or more officers, directors, managing agents, employees, and/or other person who are competent to testify, and who has/have the best overall knowledge of each of the topics listed on the annexed Exhibit "A" ("Deponent").

Said examination will be conducted before a notary public, or some other officer authorized by law to administer oaths, and will continue from day to day until completed. You are invited to attend and participate to the extent permitted by the Federal Rules of Civil Procedure.

In accordance with the following, the Deponent is directed to bring copies of the documents requested herein to the deposition:

I. Definitions And Instructions

A. "Document" or "documents" shall have the broadest meaning possible under the Federal Rules of Civil Procedure as made applicable by the Bankruptcy Rules, including, without limitation, any written, printed, handwritten recorded or graphic matter of any kind, however produced or reproduced, and regardless of where located, including, but not limited to, any financial statement, workpaper, correspondence, memorandum, note, research, checklist, opinion, compilation, chronicle, minutes, agenda, contract, agreement, report or reporting package, summary, inter-office or intra-office communication, report, or reporting package, teletype, telefax, confirmation, diary, desk or pocket calendar, notebook, day book, appointment book, work sheet, graph, chart, index, magnetic or other recording tape, computation, tabulation, transcript, meeting minutes, business record, insurance policy, data sheet, data processing sheet, card or tape, invoice or similar statement, any memorial or note reflecting conversations or meetings, computer data (including information or programs stored in a computer, whether or not

ever printed out or displayed), photograph, microfiche, microfilm, videotape, record or motion picture, and electronic, mechanical, or electric record or representation of any kind including, without limitation, tape, cassette, disc, magnetic card or recording. It includes all documents which are in your possession, custody or control, even if the documents are not in the a designated file or are not in your office files, or are in the personal files or possession of a partner, employee, servant, or agent of yours, or in the possession of your attorney. "Document" or "documents" shall also include (i) the file folders in which said documents are maintained and any table of contents or index thereto; and (ii) copies of documents of which the originals have been destroyed pursuant to a document destruction policy or otherwise.

B. In addition to originals and final versions of documents, all drafts, alterations, modifications, changes and amendments of documents should be produced, as well as all copies nonidentical to the original in any respect, including any copy bearing nonidentical markings or notations of any kind.

C. All responsive documents should be produced, whether the information therein is final, preliminary, interim, draft, actual, estimated, audited, unaudited, formal, or informal, or in a prediction, forecast, opinion, evaluation or business plan.

D. If a document contains checkmarks, tickmarks, or symbols in different colors, a colored copy shall be produced if a copy is produced in lieu of the original.

E. If a document (such as an auditing manual or permanent file) existed in different forms at different times, both the current version and the version that existed at the time shall be separately produced.

F. “Communication” includes every manner or means of disclosure, transfer, or exchange of information, whether orally or by document or whether face-to-face, by telephone, telecopier, mail, facsimile, personal delivery, overnight delivery, or otherwise.

G. If you claim any form of privilege or work product protection, whether based on statute, rule, or otherwise, as a ground for not producing any document with respect to each document for which privilege or work product protection is claimed, its date, author, addressee, if any, all recipients of the document, type (letter, memorandum, etc.), subject matter (without revealing the information as to which privilege is claimed), and, with sufficient specificity to permit the Court to make a full determination whether the claim of privilege or work product protection is valid, each and every fact or basis upon which you claim such privilege or work product protection. Notwithstanding the assertion of your objection, any requested document which you object to furnishing but which nevertheless contains non-objectionable information which is responsive to this request must be produced, but that portion of the document for which the objection is asserted may be redacted, provided that the document is marked “redacted” and provided further that the above-requested identification information is furnished.

II. Document Request

1. All documents from December 2008 to the present, including but not limited to any internal memorandum and electronic communications related to the creation, monitoring, editing, layout, pinning, alteration, additional publishing, ordering or assemblage of the Philly.com website, and in particular, within such request, the Charter School web page.

2. All documents underlying, relating to, pertaining to, or supporting the statement in the Declaration of Wendy Warren.

Dated: August 24, 2010

By: /s/ Edmond M. George, Esquire
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Danielle Gureghian and Charter School
Management, Inc.*

EXHIBIT A

AREAS OF INQUIRY

1. All documents supporting the statements contained in the Declaration of Wendy Warren.
2. The creation and operation of the Philly.com website.
3. Management of the content of the Philly.com website.
4. Operation of the “Clickability” content management system.
5. Changes of any kind to the Charter School website made between December 2008 and the present.

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Debtors.	:	Jointly Administered

CERTIFICATE OF SERVICE

I, Edmond M. George, do hereby certify that on August 24, 2010, a true and correct copy of the Notice of Rule 30(b)(6) Deposition was served via overnight delivery and by electronic delivery upon the following, as designated:

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