

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**Timothy Jackson,**

Plaintiff,

v.

**Laura Wright, et al.,**

Defendants.

Case No. 4:21-cv-00033-ALM

**RE-NOTICE OF TAKING DEPOSITION**

**TO: ANDREW CHUNG**

**c/o Benjamin Walton  
Assistant Attorney General  
General Litigation Division  
Attorney General of Texas  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711  
benjamin.walton@oag.texas.gov**

**PLEASE TAKE NOTICE:** undersigned counsel will take the following deposition:

Name: Andrew Chung

Time: October 15, 2024, 10:00 a.m., Eastern Time

Place: **This deposition will take place virtually**

upon oral examination before a Notary Public or other Officer authorized by law to take depositions in the State of Texas and videographer. The oral examination is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure. The deposition will continue from day-to-day until completed.



DATE: September 30, 2024

Respectfully submitted,

/s/Michael Thad Allen

Michael Thad Allen, Esq.  
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admitted *pro hac vice*  
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for PLAINTIFF

### **CERTIFICATE OF SERVICE**

I hereby certify that on the date specified in the caption of this document, I electronically filed the foregoing with the Clerk of Court, to be served on all parties of record via the CM/ECF system.

/s/Michael Thad Allen

Michael Thad Allen