

BEFORE THE COURT OF THE JUDICIARY  
OF  
ALABAMA



In the matter of )  
PATRICIA D. WARNER, )  
Former Circuit Judge of the ) Court of the  
Fifteenth Judicial Circuit ) Judiciary  
of Alabama ) Case No. 40

NOTICE OF 30(b)(6) DEPOSITION BY VIDEO  
OF  
ALABAMA JUDICIAL INQUIRY COMMISSION

PLEASE TAKE NOTICE that the Respondent, pursuant to Rule 30(b)(6) of the Alabama Rules of Civil Procedure, will take the video deposition of the Alabama Judicial Inquiry Commission through that person or those persons who have the most knowledge of the following areas, before a duly authorized court reporter or notary public **on August 31, 2011, at a time and specific place in Montgomery, Alabama to be determined.** Said deposition(s) will continue from day to day thereafter until completed. You are invited to attend and cross examine if you so desire. Pursuant to Rule 30(b)(6), the Respondent requests that the Judicial Inquiry Commission designate one or more managing agents or employees who are most knowledgeable in the below listed

areas to testify as a representative of the Alabama Judicial Inquiry Commission.

#### AREAS FOR TESTIMONY

1. Any and all evidence which AJIC believes supports every allegation of "bad faith," and AJIC's definition of "bad faith."
2. AJIC's consideration of Warner's responses to each complaint.
3. The substance of the testimony given by each witness who appeared before AJIC.
4. The identification of all persons contacted by AJIC during the investigation of Warner.
5. The substance of interviews of every person contacted by AJIC in regards to Warner.
6. AJIC's decision as to what materials and documents were given Warner.
7. The evidence set forth in each count of the Complaint.
8. How the evidence in each count supports each charge.
9. All evidence assembled by AJIC which may be

relevant to each and every count.

10. How AJIC became aware of the complaints against Warner.

11. How the complaints received by AJIC relate to the counts and charges in the complaint.

12. All conversations representatives of AJIC had with any persons prior to that person filing written complaints against Warner.

13. AJIC's investigation into the allegation that Warner was biased and prejudiced toward women.

14. AJIC's investigation into the allegation that Warner decided more cases in favor of men than women.

15. The procedures whereby AJIC conducted the investigation into the complaints against Warner.

16. The persons who conducted the investigation of complaints against Warner.

17. AJIC's investigation of Warner, or cases presided over by Warner, which were not initiated by written complaints to AJIC.

18. The source of the complaints to AJIC which led to the separate investigations of Warner.

19. The advisory opinion issued by AJIC in Brown.
20. The factual basis for the advisory opinion.
21. The basis for AJIC's charge that Warner failed to follow the advisory opinion.
22. All documents produced pursuant to Warner's Request for Production filed in this case.
23. AJIC's compliance with its own Rules during its investigation of Warner.
24. AJIC's consideration of Warner's request for materials made pursuant to the AJIC Rules and AJIC's response thereto.

Respectfully submitted,

s/Charles A. Dauphin  
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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2011, I electronically filed the foregoing with the Court of the Judiciary of Alabama and served the following counsel by email:

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/s Charles A. Dauphin  
Of Counsel