

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE SUBOXONE	)	Case No. 1:24-md-03092
(BUPRENORPHINE/NALOXONE)	)	
PRODUCTS LIABILITY	)	MDL No. 3092
LITIGATION	)	
	)	
This Document Relates to All Cases	)	Judge J. Philip Calabrese

**PLAINTIFFS' AMENDED NOTICE OF ORAL AND VIDEOTAPED
DEPOSITION OF VICKIE SEEGER AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, Plaintiffs, by and through the Plaintiffs' Leadership Committee, will take the following deposition upon oral examination:

Deponent: Vickie Seeger

Date: July 23, 2026

Time: 9:30 a.m. EST (local time)

Location: Luminary Hotel & Co.
2200 Edwards Drive
Fort Myers, Florida 33901

The deposition will proceed before a notary public or other person authorized by law to administer oaths and take depositions. The deposition, if not completed on the specified date, will continue on a mutually agreeable date from day-to-day, excluding Saturdays, Sundays and court-recognized holidays, until the examination is completed. The deposition will be recorded stenographically and by video recording.

Plaintiffs reserve the right to use at the trial of this action the videotape recording of the deposition of the deponent pursuant to Fed. R. Civ. P. 32(a).

Pursuant to Fed. R. Civ. P.34, the deponent is requested to produce within 30 days of service of this notice and, thereafter, supplement no less than three business days prior to the deposition the following documents:

REQUEST FOR PRODUCTION

1. To the extent not already produced, all documents in Deponent's custodial file relating to **Suboxone**, including both paper document and electronic document files that have not been produced to date. The scope of this request is intended to comport with all rulings of the Court pertaining to discovery and the custodial file protocol.
2. All documents, records, information, or other material reviewed and/or requested by Deponent in preparation for deposition.
3. All documents, records, information or other material, including but not limited to electronic data such as e-mails, shown to the Deponent by Bowman & Brooke, LLP or any other lawyer representing Defendants even if such documents are not in the Deponent's possession, in preparation for this deposition, or other testimony worldwide relating to **Suboxone**.
4. All documents the Deponent creates (or are created on his/her behalf) in preparation for this deposition.
5. A copy of any and all prior testimony given by Deponent, including but not limited to, deposition testimony, trial testimony, and/or FDA testimony relating to **Suboxone**.
6. A copy of any and all documents in Deponent's possession and control and/or available to him/her which in any way pertains to his/her training, job practices and procedures, duties, compensation and/or incentives with Defendant(s) as it pertains to **Suboxone**.
7. Deponent's most current CV and/or resume.

Dated: July 13, 2026

/s/ Ashlie Case Sletvold

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2026, a true and correct copy of the foregoing was served upon the following (via electronic mail and via the Court's electronic filing system):

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