

1 IN THE UNITED STATES BANKRUPTCY COURT FOR THE CENTRAL DISTRICT OF  
2 CALIFORNIA RIVERSIDE DIVISION

3  
4 **In Re BRIAN DENNIS MARTIN**

5 **Debtor,**

6 **DAVID TYLER MOSS and**  
7 **FIDELISSIMUS, LLC,**

8 **Plaintiffs,**

9 **vs.**

10 **BRIAN DENNIS MARTIN,**

11 **Defendant.**

Chapter 7 Case No. 6:25-bk-10944-MH  
Adversary No.6:25-ap-0 I 055-RB

**NOTICE OF DEPOSITION AND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS**

Date: December 29, 2025

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14 **NOTICE OF DEPOSITION**

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16 PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, made  
17 applicable to this proceeding by Rule 7030 of the Federal Rules of Bankruptcy Procedure, Brian  
18 Martin (“Requesting Party”) will take the deposition upon oral examination of ROBERT D.  
19 WILSON (“Deponent”), a non-party witness with relevant knowledge, on Monday, January 26,  
20 2026, at 10:00 a.m. Pacific Time. The deposition will be conducted remotely via Zoom video  
21 conference. The deposition will continue from day to day until completed, but is expected to last  
22 approximately one (1) hour.  
23

24 **DEPONENT INFORMATION**

25  
26 **Name:** Robert D. Wilson

27 **Address:** 1900 Preston Road, Suite 267-72, Plano, Texas 75093  
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1 **DEPOSITION FORMAT AND RECORDING**

2 The deposition will be taken before a duly authorized court reporter from Sommerhauser Reporting  
3 Services or other officer authorized to administer oaths. The deposition will be recorded by  
4 videographic means with stenographic backup, and the testimony will be transcribed. The  
5 Requesting Party reserves the right to use the video recording and/or transcript at trial or any  
6 hearing in this matter in accordance with the Federal Rules of Civil Procedure and the Federal  
7 Rules of Bankruptcy Procedure.  
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9 **REMOTE DEPOSITION PROCEDURES**

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- 11 1. The deposition will be conducted remotely via Zoom video conference.
  - 12 2. Meeting details, including the Zoom link, meeting ID, and password, will be provided to all  
13 parties and the Deponent at least five (5) business days prior to the deposition.
  - 14 3. All participants shall use their full names when joining the Zoom session and shall keep their  
15 video cameras on during the entirety of the deposition unless otherwise agreed.
  - 16 4. The court reporter will administer the oath to the Deponent remotely.
  - 17 5. Exhibits will be shared electronically during the deposition through the Zoom platform’s  
18 screen sharing feature or through a document sharing platform designated by the court  
19 reporting service.  
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  - 21 6. In the event of technical difficulties, the deposition may be temporarily recessed until the  
22 issues are resolved. If technical issues cannot be resolved within a reasonable time, the  
23 deposition may be continued to another date by agreement of the parties or by order of the  
24 Court.  
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  - 26 7. No person other than the Deponent, counsel, the court reporter, and the videographer shall be  
27 present in the room with the Deponent during the deposition without prior disclosure and  
28 agreement of all parties.

1 **DOCUMENT PRODUCTION**

2 Pursuant to Federal Rule of Civil Procedure 45, made applicable to this proceeding by Federal Rule  
3 of Bankruptcy Procedure 9016, the Deponent is required to produce the following documents at the  
4 deposition:

- 5 1. Any and all retainer agreements between the Deponent and Brian Martin;
- 6 2. Any and all witness statements prepared by or on behalf of the Deponent for English  
7 proceedings in 2022 that were signed and provided under oath;
- 8 3. Any and all emails, text messages, or other written communications sent by the Deponent to  
9 Dan Wyde regarding where to send Brian Martin’s lawsuit summons for 2015;
- 10 4. Any and all emails, text messages, or other written communications in the Deponent’s  
11 possession, custody, or control that mention, refer to, or relate to Brian Martin that are not  
12 protected by attorney-client privilege or other applicable privileges.  
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15 The Deponent shall produce electronic copies of these documents to the Requesting Party at least  
16 seven (7) days prior to the deposition by sending them via email to [xbrianmartinx@gmail.com](mailto:xbrianmartinx@gmail.com) or  
17 by other secure electronic means agreed upon by the parties.  
18

19 **SUBPOENA REQUIREMENT**

20 As the Deponent is a non-party witness, a subpoena pursuant to Federal Rule of Civil Procedure 45,  
21 made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 9016, will be issued  
22 and served upon the Deponent to compel attendance at this deposition and production of the  
23 requested documents. The subpoena will be served in accordance with the requirements of Federal  
24 Rule of Civil Procedure 45(b).  
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**RESERVATION OF RIGHTS**

The Requesting Party reserves the right to:

1. Use the deposition testimony and any documents produced at any hearing or trial in this matter;
2. Continue the deposition to a later date if necessary;
3. Object to any improper conduct during the deposition;
4. Seek appropriate relief from the Court for any failure to comply with this Notice or the accompanying subpoena; and
5. Supplement or amend this Notice as may be necessary or appropriate.

**LEGAL AUTHORITY**

This Notice of Deposition is issued pursuant to:

- Federal Rule of Civil Procedure 30, made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 7030;
- Federal Rule of Civil Procedure 45, made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 9016;
- Local Bankruptcy Rule 7030-1 regarding depositions; and
- Local Bankruptcy Rule 7026-1 regarding discovery.

**NOTICE TO OTHER PARTIES**

This Notice of Deposition is being served on all parties to this adversary proceeding through the Court’s CM/ECF electronic filing system in accordance with Local Bankruptcy Rules and the Administrative Procedures for Electronic Case Filing.

1 **MEET AND CONFER CERTIFICATION**

2 The undersigned certifies that prior to filing this Notice of Deposition, a good faith effort was made  
3 to confer with all parties to coordinate a mutually convenient date and time for this deposition.

4  
5 Dated: 12/29/2025

6 Respectfully submitted,

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9 Brian Martin

10 941 Cimarron Lane

11  
12 Corona, CA 92879

13 Phone: 840-207-1860

14 Email: [xbrianmartinx@gmail.com](mailto:xbrianmartinx@gmail.com)

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16 Requesting Party

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing notice of deposition was served upon the following parties by the method indicated below on [12/29/2025]:

**MARK S. ROSEN**

Attorney at Law  
27281 Las Ramblas, Ste. 200  
Mission Viejo, California 92691  
Tel: (714) 285-9838  
email: [MarkSRosen@aol.com](mailto:MarkSRosen@aol.com); [markrosen@markrosenlaw.com](mailto:markrosen@markrosenlaw.com)

- By hand delivery
- By United States mail, postage prepaid
- By overnight delivery service
- By facsimile transmission
- By electronic mail
- By electronic filing through the Court's CM/ECF system

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Dated: December 29, , [2025]

**BRIAN D. MARTIN**

Defendant in Pro Per

By: 