

1 break that they also intend to publish to the jury
2 certain documents in conjunction with that reading.

3 I have no objection to some of the
4 documents, but I have objection to four of them, Your
5 Honor, and three specifically. O-I-OCF-44,
6 O-I-OCF-27, and OCF-59.

7 Your Honor these are what is known as
8 Saranac Lake documents which are from the 1940s
9 through 1952.

10 Throughout the deposition Mr. Thomas is
11 asked has he ever received them, he says no. He is
12 asked does he ever remember reading them back then and
13 he says no.

14 Basically all of the questions asked are
15 well, wouldn't you like to have seen this, wouldn't
16 you like to have done this with these things and he
17 says yeah, I guess.

18 The bottom line is that he never received
19 them, he never read them and, therefore, I think it is
20 objectionable and irrelevant what he thinks should
21 have been done and not have been done.