

HOWARD KING : 18TH JUDICIAL DISTRICT COURT
VS. NO. 45,570 A : PARISH OF IBERVILLE
THE DOW CHEMICAL CO., ET AL : STATE OF LOUISIANA
FILED: _____ :
DEPUTY CLERK OF COURT

NOTICE TO TAKE VIDEO DEPOSITION

To: Mr. Thomas Balhoff Roedel, Parsons, Hill & Koch 8440 Jefferson Highway, Suite 301 Baton Rouge, LA 70809	Mr. Josh Koch Spyridon, Koch 3838 N. Causeway Blvd., Ste. 3010 Metairie, LA 70002
Mr. Arthur Leith McGlinchey, Stafford, Lang 643 Magazine Street New Orleans, LA 70130	Mr. Steve M. Sikich Pitre, Halley, & Sikich 702 Kirby Street Lake Charles, LA 70601
Ms. Lisa Ash Grippe & Elden 227 West Monroe Street, Ste. 3600 Chicago, IL 60606	Mr. Robert Urann Robein, Urann & Lurye 2540 Severn Ave., Ste. 400 Metairie, LA 70009

PLEASE TAKE NOTICE that undersigned counsel for plaintiff will take the video deposition of **THEODORE R. TORKELSON** for all purposes authorized under the Louisiana Code of Civil Procedure. Said deposition will be taken before a court reporter authorized to administer the oath and who is a disinterested and unrelated party on October 28, 29, 30, and 31, 1997, 9:00 a.m., at Ashman Court Hotel, 111 West Main Street, Midland, Michigan. The deposition will take place for a maximum of four hours per day, with a 45-minute recess after two hours. Said deposition shall continue from day to day thereafter, until the taking of the testimony may be adjourned, but not to exceed a period of one week.

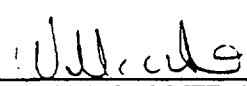
The deposition shall be videotaped and taken by a qualified court reporter.

You are so notified in order that you may appear and take such part as you deem necessary and proper.

Respectfully submitted,

BAGGETT, McCALL & BURGESS
3006 Country Club Road
Lake Charles, LA 70605
318/478-8888




WILLIAM B. BAGGETT, SR., #152
WILLIAM B. BAGGETT, JR., #1217
WELLS T. WATSON, #20406

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading has been served upon counsel for all parties by mailing the same to each, properly addressed and postage prepaid on this 27 day of October, 1997.

W. T. Watson

WELLS T. WATSON