

FILE NAME: GATX (GX)

DATE: 1998 Aug 27

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DOCUMENT DESCRIPTION: Legal - Deposition of John D. Levin

1 IN THE COURT OF COMMON PLEAS
2 TRUMBULL COUNTY, OHIO
3 LOIS J. MISSIK, Executrix,)
4 etc.)
5 Plaintiff,)
6 -VS-)No. 97-CV-303
7 OWENS-CORNING FIBERGLAS)
8 CORP., et al.)
9 Defendants.)
10
11 The Videotaped Deposition of John D.
12 Levin taken in the above-entitled cause before Rhonda
13 Snyder, Certified Shorthand Reporter, Registered
14 Professional Reporter, and Notary Public within and
15 for the County of Cook, State of Illinois at General
16 American Transportation Corporation headquarters, 500
17 West Monroe Street, Suite 4300, Chicago, Illinois,
18 commencing at 9:27 a.m. on Thursday, August 27, 1998.
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1 APPEARANCES:
2
3 Swartz & Reed
4 Mr. Dean E. Swartz
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8 On behalf of the Plaintiff,
9
10 Thompson, Hine & Flory, LLP
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15 On behalf of the Defendants.
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1 I N D E X
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4 WITNESS: PAGE LINE
5 John D. Levin
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8 E X H I B I T S
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1 THE VIDEOGRAPHER: This is Karen Kowalik of
2 Legal Video Services, Incorporated, 615 Berkshire
3 Court, Schaumburg, Illinois. I am the operator of
4 this camera. This video deposition of John Levin
5 is being taken on behalf of the plaintiffs at the
6 offices of American Transportation Company, 500
7 West Monroe, Chicago, Illinois on August 27, 1998
8 at 9:27 a.m. as indicated on the video screen.
9 This case is captioned Lois J.
10 Missik, Executrix, etc., versus Owens-Corning
11 Fiberglass Corporation. The case number is
12 97-CV-303. Will the attorneys please identify
13 themselves for the video record?
14 MR. SWARTZ: This is Dean Swartz accompanied
15 by my paralegal, Natalie Prince, on behalf of
16 Mrs. Missik. And let me just as a clarification,
17 the deposition of Mr. Levin is being taken pursuant
18 to the Notice under Rule 30(B)(3) and (5) of
19 Mr. David Anderson. And by agreement of counsel,
20 Mr. Levin will be the corporate designee for this
21 deposition.
22 MR. DANIELS: And my name is Steve Daniels and
23 I'm here on behalf of GATX.
24 THE VIDEOGRAPHER: Thank you. Will the court

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1 reporter please identify herself and swear in the
2 witness?

3 THE COURT REPORTER: My name is Rhonda Snyder
4 from Certified Reporting.

5 (Witness sworn.)

6 THE VIDEOGRAPHER: Thank you. Please proceed.

7 JOHN D. LEVIN,

8 having been first duly sworn was

9 examined and testified as follows:

10 EXAMINATION

11 BY MR. SWARTZ:

12 Q. Good morning, sir. Will you please
13 identify yourself for the record?

14 A. John Levin.

15 Q. And what is your business address,
16 Mr. Levin?

17 A. 500 West Monroe Street, Chicago, 60661.

18 Q. And what is your current position?

19 A. Assistant general counsel, GATX

20 Corporation.

21 Q. And is it your understanding, sir, that you
22 are here as GATX's corporate representative to
23 testify about two topic areas?

24 A. Yes, it is.

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1 Q. And is the first topic area the operation
2 and activities of the GATX/GATC Law Department
3 including the duties and responsibilities of
4 GATX/GATC's general counsel and other in-house
5 counsel prior to 1975?

6 A. Yes, it is.

7 Q. And is the second topic area that you
8 understand you are here to testify about state or
9 federal requirements, regulations, rules, laws,
10 statutes, or standards concerning
11 industrial/occupational health and safety at
12 GATX/GATC manufacturing and repair facilities prior
13 to 1975?

14 A. Yes, it is.

15 Q. Now, for what time period prior to 1975 are
16 you prepared to testify?

17 A. From approximately 1961 to 1975.

18 Q. Have you spoken with anyone in preparation
19 for today's deposition? And that, of course,
20 excludes communications with --

21 A. Counsel.

22 Q. -- the defendant's counsel.

23 A. Yes.

24 Q. With whom have you spoken?

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1 A. I've spoken to Michael Lyons, L-y-o-n-s,
2 who was with the GATX Law Department from
3 approximately 1970 to 1977 or 1978. And I've spoken
4 to James Glasser, G-l-a-s-s-e-r, who was with the
5 GATX Law Department from approximately 1961 to 1968.

6 Q. Where is Mr. Lyons now?

7 A. Practicing law in Pittsburgh.

8 Q. What was his position while he was with
9 GATX?

10 A. Attorney in the Law Department.

11 Q. Who was the general counsel during that
12 time period?

13 A. George W. Rothschild, R-o-f --
14 R-o-t-h-s-c-h-i-l-g -- d, Rothschild.

15 Q. Where is Mr. Rothschild?

16 A. He's deceased.

17 Q. And who was the general counsel that
18 preceded him?

19 A. That I don't know.

20 Q. Did you ask Mr. Glasser who the general
21 counsel was during the 1961 to 196 --

22 A. It was also Mr. Rothschild.

23 Q. And where is Mr. Glasser presently?

24 A. He's retired from GATX.

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1 Q. And where is he located?

2 A. In the Chicago area.

3 Q. Other than those two gentlemen have you
4 spoken to anyone else?

5 A. I've spoken to other people in the Law
6 Department who were not here then just to see if they
7 knew of anything.

8 Q. To see if they knew anything?

9 A. That related to the earlier period.

10 Q. Right. In terms of the length of time that
11 you have been in the GATX Law Department, have you
12 been here longer than anyone else presently?

13 A. Yes.

14 Q. How long have you been in the Law
15 Department?

16 A. From 1972.

17 Q. You have a tendency, as I think I often do,
18 and that's to start answering a question before it's
19 been asked.

20 A. Yes. I'll wait.

21 Q. So will you please wait until I complete my
22 question?

23 A. Yes.

24 Q. Thank you. Did you review any materials in

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1 preparation for the deposition today?

2 A. Yes.

3 Q. And what materials have you reviewed?

4 A. I reviewed the basically the files and

5 indexes to the files and the index to the files in

6 storage of the GATX Law Department.

7 Q. And where are those indexes to files and

8 files in storage located?

9 A. They're just a notebook. The files in

10 storage are in a notebook in the Law Department. The

11 files in the file room are on-line. They're just in

12 a WordPerfect file.

13 Q. Miss Prince and I have been here in Chicago

14 since Monday around midday reviewing materials in

15 boxes. Are any of the boxes that you have referred

16 to among those approximately 300 boxes that were made

17 available to me for review this week?

18 A. Can I speak to my -- I'm not -- I know that

19 there were no files -- particular files in the Law

20 Department records that were responsive. I just

21 don't know if any were. May I ask my counsel if --

22 Q. All right. Well --

23 A. I don't specifically know the answer.

24 MR. DANIELS: And I don't know what he looked

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1 at so I can't answer that question.

2 MR. SWARTZ: All right.

3 BY MR. SWARTZ:

4 Q. Just so that we're clear, if you don't know

5 an answer, don't hesitate to just say those simple

6 words, I do not know.

7 A. Okay.

8 Q. All right. What files did you review?

9 A. There were no files that related to that

10 period of time.

11 Q. Were there files that related to earlier

12 periods of time?

13 A. No.

14 Q. Generally speaking, what did those files

15 consist of?

16 A. In the records?

17 Q. The files that you looked at in the

18 indexes.

19 A. The index related -- the materials that we

20 have in storage relate mostly to transactions,

21 litigation involving matters having nothing to do

22 with Sharon asbestos or the like. It's rail car

23 cases.

24 Q. Did any of those cases involve occupational

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1 or industrial health and safety matters?

2 A. No.

3 Q. Other than those files and the indexes to

4 which you referred at the beginning of this series of

5 questions, have you reviewed anything else?

6 A. I have also reviewed some materials

7 supplied relating to health and safety issues from

8 1971.

9 Q. And this would be information in the orange

10 binder that is sitting in front of you?

11 A. That's correct.

12 Q. Now, one of those binders -- there are two

13 of them. One of them says Supervisor Safety Manual.

14 If my understanding is correct, one of them relates

15 to matters at GATX Terminals; is that correct?

16 A. Yes. Yes. These are both supplied by an

17 employee at GATX Terminals. One of them is limited

18 solely to GATX Terminals matters. The other is

19 generic and refers to GATX Corporation at the various

20 divisions and subsidiaries in 1971.

21 Q. With regard to the Terminals Manual do I

22 assume that that manual did not furnish you with

23 information?

24 A. That is correct.

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1 Q. All right. Then we won't deal with that.

2 And why don't you just push that one aside so we

3 don't get confused with that as we may have already.

4 MR. SWARTZ: The binder that is sitting in

5 front of you, I'm going to have us identify that as

6 Plaintiff's Deposition Exhibit Number 13. I'm not

7 going to put this sticker on it at this time.

8 What we'll do is we'll take care of

9 this afterwards and we'll have a copy made and

10 we'll attach the sticker to that and the original

11 can be maintained by General American. Is that

12 acceptable to all?

13 MR. DANIELS: Yes.

14 (Whereupon Plaintiff Exhibit

15 No. 13 was marked for

16 identification.)

17 BY MR. SWARTZ:

18 Q. From whom did you obtain the Plaintiff's

19 Deposition Exhibit Number 13?

20 A. David Berg.

21 Q. And that's the same Mr. Berg who I deposed

22 about a month ago; isn't that correct?

23 A. That is correct.

24 Q. And this book contains information about

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1 health and safety -- occupational health and safety
 2 matters?
 3 A. From the period 1971.
 4 Q. Did Mr. Berg tell you where he obtained
 5 this?
 6 A. Subsequent to his deposition and refreshing
 7 his own recollection because of that, he remembered
 8 that these volumes were in some place at GATX
 9 Terminals. I don't know where anyone found them.
 10 Q. When did you see them for the first time or
 11 did you see it for the first time?
 12 A. Subsequent to Mr. Berg's deposition.
 13 Q. Was it yesterday?
 14 A. No, no. It was -- received it I don't
 15 remember exactly when. A couple weeks ago.
 16 Q. Why don't you tell the jury just generally
 17 what's in Plaintiff's Deposition Exhibit Number 13.
 18 A. It contains first a copy of the
 19 Occupational Health and Safety Act of 1970. It
 20 contains a brochure entitled What You Must Know About
 21 The New Occupational Safety and Health Law. It then
 22 contains a series of GATX memoranda. The first is
 23 from J.R. Scanlon dated May 26, 1971.
 24 Q. Who was Mr. Scanlon?

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1 A. Mr. Scanlon was the president and chief --
 2 excuse me, I'm getting caught on my wire -- president
 3 and chief operating officer of General American
 4 Transportation Corporation which was -- which is
 5 today known as GATX Corporation.
 6 Q. And if you know was the purpose of that
 7 memoranda -- memorandum to distribute the OSHA
 8 statute and regulations?
 9 A. The purpose of the memoranda was to notify
 10 the distribution list of the new law which was new at
 11 that time and attached a memoranda to it stating
 12 company policy. The distribution list is -- were the
 13 divisional vice-presidents.
 14 Q. All right. And this was sometime in 1971?
 15 A. Yeah. May 1971.
 16 Q. And this was related to what perhaps would
 17 be commonly known as the OSHA Act?
 18 A. Yes.
 19 Q. In any event, attached to that memoranda
 20 are compliance guidelines and then just a series of
 21 memoranda regarding the law and the requirements of
 22 the company under the law. There is then a
 23 memorandum, also from -- this is August 1971, from
 24 P.A. Gatte, G-a-t-t-e, who I understood from people

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1 was the -- who is deceased but was the person
 2 responsible for health and safety at that time.
 3 Q. What was his position if you know?
 4 A. That I don't know. I just -- people
 5 just -- you ask who is responsible, they always
 6 mentioned Mr. Gatte's name.
 7 Q. All right.
 8 A. Following that is some articles and then
 9 some BNA reports all regarding OSHA --
 10 Q. BNA being the Bureau of National Affairs?
 11 A. Affairs, correct. Additional memoranda
 12 from Mr. Gatte to all locations which would be
 13 throughout all the company and then copies of law --
 14 excuse me, federal regulations.
 15 Q. The federal regulations setting out the
 16 implementation of the Act; is that correct?
 17 A. Well, the regulations of May 29, 1971 and a
 18 number of pages.
 19 Q. All right. Well, what is your
 20 understanding of what those regulations are?
 21 A. They are the standards, the federal
 22 standards under OSHA.
 23 Q. Were these standards -- was GATX expected
 24 to know the content of these standards as it related

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1 to its industrial operations?
 2 MR. DANIELS: Object to the form.
 3 THE WITNESS: I really don't understand.
 4 BY MR. SWARTZ:
 5 Q. And, please, any time I ask a question that
 6 you don't understand, let me know and I will attempt
 7 to rephrase it. What was the purpose for
 8 distributing the regulations?
 9 A. That I -- I'm assuming it was to inform the
 10 recipients of the requirements of the law.
 11 Q. Were the recipients expected to follow the
 12 requirements of the law?
 13 A. The policies in here imply that it was the
 14 intention of senior management to other senior
 15 management to the operating management that the
 16 primary responsibility for compliance with the law
 17 starts with local management level. And I'm assuming
 18 that the intention is that the company comply with
 19 that law.
 20 Q. All right, sir. What, if any, involvement
 21 during any of these time periods about which you are
 22 here to testify was the general counsel's office
 23 involved in the General American Transportation's
 24 goal to satisfy and follow the law as it relates to

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1 OSHA?

2 A. Can I sort of a narrative?

3 Q. Yes.

4 A. The way as all of us who have spoken to
5 which covers the period from 1961 through 1975 recall
6 the management of the Law Department, the Law
7 Department consisted of a few lawyers, as many as
8 four, a general counsel, Mr. Rothschild, who reported
9 to an executive vice-president who was also a lawyer,
10 Mr. Jack Levy, L-e-v-y.

11 The Law Department, the lawyers, were
12 used on a project as assigned. Mr. Levy and
13 Mr. Rothschild were responsible for the legal, you
14 know, management -- or the management of the legal
15 affairs of the company. They would have used the Law
16 Department as they wanted to or they would have used
17 outside counsel.

18 None of us who I have spoken to, the
19 three people, worked on safety matters. We assumed
20 that Mr. Rothschild and Mr. Levy either asked someone
21 else in the Law Department or one of the law firms
22 that would be used to get this information.

23 Q. Now, you have addressed part of the topic
24 area number two and that are federal requirements and

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1 regulations, laws, and statutes related to industrial
2 and occupational health and safety matters. What are
3 you able to tell the jury about state requirements,
4 regulations, rules, laws, statutes, or standards?

5 A. That I was able to find no information on.
6 I have no information on that.

7 Q. Did General American Transportation
8 Corporation have any responsibility to follow any
9 state laws? And I'm going to use that as an
10 abbreviation, that's laws, regulations, standards, et
11 cetera, et cetera concerning occupational safety and
12 health. Did it have an obligation to follow any
13 state laws prior to the passage of the Federal OSHA?

14 MR. DANIELS: Object to the form. Lack of
15 foundation. You may answer if you know.

16 THE WITNESS: I'm assuming if laws were in
17 place that we would have an obligation to follow
18 them. But I have no information regarding that
19 period of time whether there were laws and
20 regulations in place from my conversations, my
21 personal observations, and the records I was able
22 to see.

23 BY MR. SWARTZ:

24 Q. If there were Ohio regulations for the

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1 prevention and control of diseases resulting from
2 exposure to toxic fumes, vapors, mists, gases, and
3 dust, would you expect General American
4 Transportation Corporation to be aware of them?

5 A. I would expect that Mr. Levy or
6 Mr. Rothschild would have known of them.

7 Q. And if there were in existence the legal
8 requirements for prevention and control of industrial
9 public health hazards for the State of Ohio, would
10 you expect General American Transportation
11 Corporation to be aware of those?

12 MR. DANIELS: Object to the form. You may
13 answer.

14 MR. SWARTZ: What's the basis?

15 MR. DANIELS: Calls for a hypothetical. You
16 can answer.

17 THE WITNESS: If -- I mean I'm assuming that
18 the management in their relations with the various
19 law firms would have been aware of the legal
20 requirements to General American.

21 BY MR. SWARTZ:

22 Q. Let's change it from the hypothetical as
23 Mr. Daniels seems to have a problem with that. Let
24 me ask this specifically. Was General American

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1 Transportation Corporation aware of the legal
2 requirements for the prevention and control of
3 industrial public health hazards promulgated by the
4 Division of Industrial Hygiene of The Ohio Department
5 of Health in Columbus, Ohio?

6 MR. DANIELS: When? Object.

7 MR. SWARTZ: That became effective in 1946.

8 THE WITNESS: I have no -- I can't -- I don't
9 know.

10 BY MR. SWARTZ:

11 Q. General American Transportation Corporation
12 operated manufacturing facilities in Ohio in 1946,
13 didn't it?

14 A. Correct.

15 Q. And that facility specifically was located
16 on the Ohio-Pennsylvania border in Masury,
17 M-a-s-u-r-y, Ohio and Sharon, Pennsylvania; is that
18 correct?

19 A. Correct.

20 Q. General American Transportation Corporation
21 had facilities in other states as well other than the
22 Masury, Ohio facility, didn't it?

23 A. Correct.

24 Q. And would you expect General American

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1 Transportation Corporation to be aware of the state
2 laws and regulations that applied to occupational
3 safety and health in each state in which it was
4 conducting industrial and/or manufacturing
5 operations?

6 A. Again I would say Mr. Levy and
7 Mr. Rothschild would have the responsibility for
8 that. I presume they were aware of the laws.

9 Q. Are there any files maintained by General
10 American Transportation Corporation that relate to or
11 that contain copies of laws, statutes, regulations
12 concerning industrial and occupational health and
13 safety?

14 A. You mean general -- you don't mean the Law
15 Department files?

16 Q. Well, first let's start with the Law
17 Department. Does the Law Department have a book or a
18 file or anything that has state occupational, safety,
19 and health regulations in it?

20 A. We have some files, obviously, that deal
21 with specific matters that may have copies of --
22 copies of laws, but most of our source material today
23 is taken off the centralized data -- without wanting
24 to use trade names, centralized data processing like

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1 Westlaw and Lexus. We get most of our state
2 information that way.

3 Q. If copies -- and I ask this almost with the
4 indulgence of defense counsel and he has been nice to
5 let me go into this because one of the areas we
6 deposed you on a month ago was records and things of
7 that nature, so I don't think that it's necessarily
8 unreasonable to ask you this question because it kind
9 of overlaps with the one we're talking about now.
10 And certainly if there's an objection, I will not
11 pursue this further.

12 But let me ask you this. Did General
13 American Transportation Corporation maintain files on
14 state health and safety regulations at any time?

15 A. The only information I have on that are the
16 indices from the file, the materials that are in
17 storage. If you talk about are there copies of laws,
18 people have copies of regulation and files, I don't
19 know the answer to that question. It would be -- it
20 would relate to what the particular people who had
21 that responsibility have put in their files. I know
22 that there's BNA Reporters and that kind of thing.

23 Q. How far back do the BNA Reporters go if you
24 know?

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1 A. All I know is they're current. I don't
2 know how far back they go.

3 Q. All right. And those are located in the
4 Legal Department?

5 A. Some -- I don't think we have -- we may
6 have a CCH Label Reporter. I know that some of the
7 subsidiaries get their own services for their own
8 people.

9 Q. Do you know whether or not General American
10 Transportation received the monthly bulletins from
11 the United States Department of Labor?

12 A. I don't know that.

13 Q. How about the Illinois Department of Labor?

14 A. I don't know that.

15 Q. To which department if not the Law
16 Department would those types of documents go, that
17 is, monthly labor reports from the federal and state
18 Departments of Labor?

19 A. I don't know that.

20 Q. I believe at your previous deposition you
21 testified about where you located a copy of the
22 health hazard evaluation that NIOSH conducted in
23 Masury, Ohio?

24 A. That is correct.

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1 Q. In what file was that maintained?

2 A. At the time that we were responding to the
3 discovery request I went to the health and safety
4 people at General American and we went through a list
5 of index of boxes and tried to figure out which ones
6 related to health and safety and asked for them. I
7 don't remember the box name or the box number, to be
8 honest.

9 There were about four or five boxes
10 that looked that were responsive. And we went
11 through them. The material in most of them was not
12 responsive. It was odd material. But in a manila
13 folder in one of the boxes was this report.

14 Q. Do you have a list of those boxes, those
15 four or five boxes?

16 A. No.

17 Q. Is there any way you can determine which
18 four or five boxes you looked at when you were
19 attempting to obtain information on occupational and
20 safety --

21 A. Probably go back to the list and try and
22 figure out which ones they were. That's about all.

23 MR. SWARTZ: All right. Sir, I think that is
24 all. And I have attempted to keep my promise to

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1 make this short.
 2 MR. DANIELS: I don't have anything.
 3 THE WITNESS: Thank you.
 4 THE VIDEOGRAPHER: This concludes the
 5 deposition of John Levin. Off the record at
 6 9:53 a.m.
 7 (The deposition was concluded.)
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1 STATE OF ILLINOIS)
 2) SS.
 3 COUNTY OF COOK)
 4 I, Rhonda Snyder, CSR, RPR, and Notary
 5 Public within and for the County of Cook and State of
 6 Illinois do hereby certify that on Thursday, August
 7 27, 1998 at the hour of 9:27 a.m. personally appeared
 8 before me at General American Transportation
 9 Corporation headquarters, 500 West Madison Street,
 10 Suite 4300, Chicago, Illinois, John D. Levin, in a
 11 certain cause now pending and undetermined in the
 12 Court of Common Pleas, Trumbull County, Ohio.
 13 I further certify that the said
 14 witness was first duly sworn to testify to the truth,
 15 the whole truth and nothing but the truth in the
 16 cause aforesaid; that the testimony then given by
 17 said witness was reported stenographically by me in
 18 the presence of the said witness, and afterwards was
 19 transcribed via computer-aided transcription, and the
 20 foregoing is a true and correct transcript of the
 21 testimony so given by said witness.
 22 I further certify that the signature
 23 of the witness to the foregoing deposition was not
 24 waived by agreement of counsel.
 25 I further certify that I am not
 26 counsel for nor in any way related to any of the
 27 parties to this suit nor am I in any way interested
 28 in the outcome thereof.
 29 IN TESTIMONY WHEREOF, I have hereunto
 30 set my hand and affixed my notarial seal on September
 31 4, 1998.
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