

FILE NAME: Square D (SQD)

DATE: 2014

DOC#: SQD007

DOCUMENT DESCRIPTION: Legal – Deposition of Redfield for Square D –  
App#1

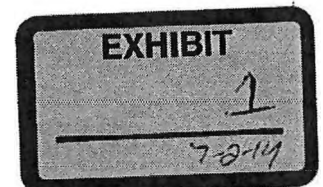
IN THE CIRCUIT COURT FOR THE CITY OF ST. LOUIS  
STATE OF MISSOURI  
TWENTY-SECOND JUDICIAL CIRCUIT

|                                 |   |                        |
|---------------------------------|---|------------------------|
| Jeff Kovar,                     | ) |                        |
|                                 | ) |                        |
| Plaintiff,                      | ) | Cause No. 1322-CC01123 |
|                                 | ) |                        |
| v.                              | ) |                        |
|                                 | ) |                        |
| Schneider Electric USA, et al., | ) |                        |
|                                 | ) |                        |
| Defendants.                     | ) |                        |

NOTICE OF CORPORATE VIDEO DEPOSITION: DEFENDANT SQUARE D COMPANY

Comes now the Plaintiff, by and through his attorney, pursuant to Rule 57.03 (b) (4) of the Missouri Rules of Civil Procedure and hereby requests that Defendant Schneider Electric USA, Inc., formerly known as Square D Company ("Square D Company") designate one or more officers, directors or management agents, or other persons who consent to testify on its behalf to the following matters:

- A. The use of asbestos or asbestos containing products in and around products manufactured in your Cedar Rapids, Iowa and Columbia, Missouri plants from 1958 through 1986.
- B. The exposure of employees such as Lyle C. Kovar to asbestos or asbestos containing products in your Cedar Rapids, Iowa and Columbia, Missouri plants from 1958 through 1986.
- C. When Square D Company first became aware of the hazards associated with exposure to asbestos dust;
- D. Lyle C. Kovar's work responsibilities while an employee of yours from 1958 through 1996;



- E. Lyle C. Kovar's exposure to asbestos or asbestos dust while employed by Square D Company from 1958 through 1986;
- F. Warnings, cautions, notifications, guidelines or education provided to employees of Square D Company, to include Lyle Kovar, from 1958 to 1986 regarding:
  - 1. The hazards and health effects of asbestos exposure; and
  - 2. Recommended practices for working with and around asbestos.
- G. Systems, policies, procedures, or practices implemented by Square D Company to measure, minimize or eliminate employee exposure to asbestos or asbestos containing products at your Cedar Rapids, Iowa and Columbia, Missouri plants; and
- H. Systems, policies, procedures, or practices implemented by Square D Company to medically monitor its employees at the Cedar Rapids, Iowa and Columbia, Missouri plants for evidence of asbestos inhalation or asbestos disease.

THE DEPOSITION OF SAID DESIGNEES(S) SHALL TAKE PLACE ON THE FOLLOWING DATE AT THE FOLLOWING TIME AND LOCATION:

| <u>Date</u>  | <u>Time</u> | <u>Location</u>                                             |
|--------------|-------------|-------------------------------------------------------------|
| July 2, 2014 | 10:00AM     | 70 West Madison Street,<br>Suite 3100, Chicago,<br>IL 60602 |

The Designee(s) shall provide to Plaintiff's Counsel any and all Items as described in Exhibit A attached hereto at the time and location of the deposition.

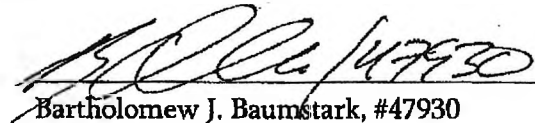
If Square D Company designates more than one officer, director, managing agent, or other persons to testify the first deposition shall occur on the date and at the time and location identified herein with each subsequent deposition to take place immediately following the preceding deposition.

Each person so designated by Square D Company shall testify as to matters known or reasonably available to Square D Company.

The deposition shall be taken and recorded by a certified court reporter of PohlmanUSA Court Reporting, 10 South Broadway, Suite 1400, St. Louis, MO 63102 or by a person or entity retained

Respectfully Submitted,

O'BRIEN LAW FIRM, PC



Bartholomew J. Baumstark, #47930

815 Geyer Ave.

St. Louis, MO 63104

Phone: 314/588-0558

Fax: 314/588-0634

ATTORNEY FOR PLAINTIFF

Exhibit A

1. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter A
2. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter B
3. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter C
4. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter D
5. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter E
6. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter F
7. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter G
8. All documents reviewed and or relied upon by the Designee(s) in preparation for testimony regarding Matter H

**Certificate of Service**

The O'Brien Law Firm, P.C. certifies that a true and correct copy of the foregoing was caused to be sent by facsimile, this day being June 23, 2014 to:

A J. Bronsky  
Brown & James, P. C.  
800 Market Street  
Suite 1100  
St. Louis, MO 63101-2501  
Fax: 314-242-5524  
General Gasket Corp.

Anita Kidd  
Armstrong Teasdale, L.L.P.  
7700 Forsyth Blvd., Suite 1800  
Clayton, MO 63105  
Fax: 314-621-5065  
Ashland, Inc.  
General Electric Company  
Hercules, Inc. fka Hercules Powder Co.

Charles Joley  
Joley, Oliver, & Beasley P.C.  
8 East Washington Street  
Belleville, IL 62220-2750  
Fax: 618-235-9632  
Metropolitan Life Insurance Company

Daniel Donahue  
Foley & Mansfield, P.L.L.P.  
1001 Highlands Plaza Drive West, Suite 400  
St. Louis, MO 63110  
Fax: 314-925-5701  
Flexo Supply Company, Inc.  
Plastics Engineering Co  
Mueller Water Products, Inc.  
Viacom, Inc.

Dennis J. Dobbels  
Polsinelli Shughart PC  
105 West Vandalia Street, Suite 400  
Edwardsville, IL 62025  
Fax: 618-655-9640  
Schneider Electric USA, Inc.

Edward McCambridge  
Segal McCambridge Singer & Mahoney, Ltd.  
233 South Wacker Dr., Suite 5500  
Chicago, IL 60606  
Fax: 312-645-7711  
Rogers Corp.  
H. M. Royal Inc.

Brenda Baum  
HeplerBroom  
30 North LaSalle Street  
Suite 2900  
Chicago, IL 60602  
Fax: 618-656-1364  
Ingersoll-Rand Company

J. Hayes Ryan  
Gordon & Rees LLP  
One North Franklin, Suite 800  
Chicago, IL 60606  
Fax: 312-565-6511  
3M Co.

Jeffrey T. Bash  
Lewis, Brisbois, Bisgaard & Smith  
Mark Twain Plaza II Suite 300  
103 W. Vandalia Street  
Edwardsville, IL 62025  
Fax: 618-692-6099  
Union Carbide Corporation

John Kurowski  
Kurowski Shultz, LLC  
228 West Pointe Drive  
Swansea, IL 62226  
Fax: 618-277-6334  
A.W. Chesterton, Inc.

Kent L. Plotner  
Heyl, Royster, Voelker & Allen  
105 West Vandalia, Suite 100  
Edwardsville, IL 62025  
Fax: 618-656-7940  
Riley Power, Inc.  
McKesson Corporation

Kurt L. Rasmussen  
Rasmussen, Willis, Dickey & Moore, LLC  
9200 Ward Parkway, Suite 400  
Kansas City, MO 64114  
Fax: 816-960-1669  
Genuine Parts Co.

Mark Zellmer  
Husch Blackwell LLP  
190 Carondelet Plaza, Suite 600  
St. Louis, MO 63105  
Fax: 314-480-1551  
**Occidental Chemical Corp.**

Nicole Behnen  
Polsinelli Shughart, P.C.  
100 South Fourth Street, Suite 1110  
St. Louis, MO 63102-1825  
Fax: 314-231-1776,  
**Square D Co.**

Robert Riley  
Schiff, Hardin & Waite  
6600 Sears Tower  
Chicago, IL 60606  
Fax: 312-258-5700  
**Uniroyal, Inc.**

Robert Andrekanic  
Crivello, Carlson, Picou & Andrekanic LLC  
1012 Plummer Drive, Suite 201  
Edwardsville, IL 62025  
Fax: 618-655-0250  
**Foster Wheeler Energy Corp.**

Stephen J. Maassen  
Hoagland, Fitzgerald, Smith & Pranaitis  
401 Market Street  
Alton, IL 62002  
Fax: 618-465-3744  
**J. P. Bushnell Packing Supply Company**

Stephen J. Maassen  
Hoagland, Fitzgerald, Smith & Pranaitis  
401 Market Street  
Alton, IL 62002  
Fax: 618-465-3744  
**Crown Cork & Seal USA, Inc.**

Steve Beshore  
Husch Blackwell Sanders  
190 Carondelet Plaza, Suite 600  
St. Louis, MO 63105-3441  
Fax: 314-480-1551  
**American Cyanamid Company**  
**Cytec Engineered Materials Inc.**  
**BASF Catalyst LLC**  
**Cytec Industries, Inc.**  
**BASF Corp**

Thomas Kernell  
Kernell Law Firm P. C.  
800 Market St., Suite 2100  
St. Louis, MO 63101  
Fax: 314-241-7106  
**Imrie-Gielow, Inc.**

Tracy J. Cowan  
Hawkins, Parnell, Thackston & Young LLP  
10 South Broadway, Suite 1300  
St. Louis, MO 63102  
Fax: 314-678-8686  
**Reichold Inc.**

Yasmin Tayyab  
Morgan Lewis & Bockius, LLP  
77 West Wacker Drive  
Chicago, IL 60601-5094  
Fax: 312-324-1001  
**Tyco Valves & Controls, Inc.**  
**Grinnell Corp.**  
**Henry Pratt Co., LLC**  
**Anderson Greenwood and Co.**

## Frank M. McKay

---

**From:** Valerie Simmons  
**Sent:** Monday, June 23, 2014 1:08 PM  
**To:** Frank M. McKay  
**Subject:** FW: Transmission Result : Error From "314 588 0634"(Fax Message NO.1457)  
**Attachments:** 20140623121302638.tif

-----Original Message-----

From: [ricoh@olf2.local](mailto:ricoh@olf2.local) [<mailto:ricoh@olf2.local>]  
Sent: Monday, June 23, 2014 12:13 PM  
To: Valerie Simmons  
Subject: Transmission Result : Error From "314 588 0634"(Fax Message NO.1457)

This E-mail was sent from "RNP0026736EE7CF" (MP C5503).

Queries to: [ricoh@olf2.local](mailto:ricoh@olf2.local)

\*\*\*\*\* Communication Result Report( 2014. 6.23 12:12 ) \*\*\*\*\*

Sender:  
Time : 2014/ 6/23 11:08

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[Dest.] G3 :242-5524  
[Sent Page/Total Page] 7/ 7 [Result] OK  
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[Sent Page/Total Page] 7/ 7 [Result] OK  
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[Sent Page/Total Page] 7/ 7 [Result] OK  
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[Sent Page/Total Page] 7/ 7 [Result] OK  
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[Sent Page/Total Page] 0/ 7 [Result] E-3)3)  
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[Sent Page/Total Page] 7/ 7 [Result] OK  
[Dest.] G3 :1-618-692-6099  
[Sent Page/Total Page] 7/ 7 [Result] OK  
[Dest.] G3 :1-618-277-6334  
[Sent Page/Total Page] 7/ 7 [Result] OK  
[Dest.] G3 :1-618-656-7940  
[Sent Page/Total Page] 7/ 7 [Result] OK  
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[Sent Page/Total Page] 7/ 7 [Result] OK

**Frank M. McKay**

---

**From:** Valerie Simmons  
**Sent:** Monday, June 23, 2014 1:09 PM  
**To:** Frank M. McKay  
**Subject:** FW: Transmission Result : OK From "314 588 0634"(Fax Message NO.1458)  
**Attachments:** 20140623121941701.tif

-----Original Message-----

**From:** [ricoh@olf2.local](mailto:ricoh@olf2.local) [<mailto:ricoh@olf2.local>]  
**Sent:** Monday, June 23, 2014 12:20 PM  
**To:** Valerie Simmons  
**Subject:** Transmission Result : OK From "314 588 0634"(Fax Message NO.1458)

This E-mail was sent from "RNP0026736EE7CF" (MP C5503).

Queries to: [ricoh@olf2.local](mailto:ricoh@olf2.local)

\*\*\*\*\* Communication Result Report( 2014. 6.23 12:18 ) \*\*\*\*\*

**Sender:**  
**Time :** 2014/ 6/23 12:14

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[Dest.] G3 :1-618-465-3744  
[Sent Page/Total Page] 7/ 7 [Result] OK

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**Reason for error**  
E.1) Hang up or line fail  
E.2) Busy  
E.3) No answer  
E.4) No facsimile connection  
E.5) Exceeded max. E-mail size  
E.6) Destination does not support IP-Fax

[Dest.] G3 :480-1551  
[Sent Page/Total Page] 7/ 7 [Result] OK  
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[Dest.] G3 :1-312-324-1001  
[Sent Page/Total Page] 7/ 7 [Result] OK

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Reason for error

- E.1) Hang up or line fail
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- E.6) Destination does not support IP-Fax