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2 sent?
3 MR. SHIPLEY: A copy of the notice was
4 sent.
5 MR. LANIER: No copy of the other
6 notice was sent to him?
7 MR. SHIPLEY: Not that I'm aware of.
8 THE VIDEOGRAPHER: This is tape number
9 one of the videotaped deposition of Mr. Ian
10 Sayers in the matter of In Re: Minnesota
11 Personal Injury Asbestos Cases, in the State
12 of Minnesota District Court, County of
13 Ramsey; and Conwed versus Union Carbide
14 Chemical and Plastics Company, Inc., in the
15 United States District Court, Fifth
16 Division, District of Minnesota; and
17 Kelly-Moore versus The Dow Chemical Company,
18 et al., in the United States Court for the
19 Southern District of Texas. Galveston
20 Division, Number 02-CV-00477-G.
21 The deposition is being held at the
22 law offices of Orrick, Harrington &
23 Sutcliffe, LLP, 666 Fifth Avenue, New York.
24 New York, on August 2nd, 2002, at
25 approximately 9:31 a.m.

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2 My name is Jorge Munoz, and with me is
3 Gary Delgado. We are legal video
4 specialists from the firm of Spherion Court
5 Reporting Corporation. The court reporter
6 is Laurie Collins, in association with
7 Spherion Court Reporting Corporation at 545
8 Fifth Avenue, New York, New York.
9 For the record will counsel please
10 introduce themselves.
11 MR. WILL: My name is Trevor Will. I
12 appear for Union Carbide in the Minnesota
13 Personal Injury Asbestos Cases and in the
14 Conwed Corporation versus Union Carbide
15 case.
16 MR. BROWNSON: Bob Brownson
17 representing Conwed.
18 MR. POLK: Michael S. Polk, P-O-L-K,
19 representing the Minnesota asbestos
20 plaintiffs.
21 MR. LANIER: My name is Mark Lanier.
22 I've got some people with my office with me.
23 I represent Glenda Allphin individually and
24 a personal representative of the heirs and
25 estate of James Allphin in a court that has

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2 cross-noticed this.
3 I'm going to attach a copy of this
4 deposition notice because it wasn't read in
5 the style, but it's number 15507. It's in
6 the District Court of Brazoria County,
7 Texas, the 23rd Judicial District, Judge Ben
8 Hardin presiding.
9 He's also been notified that this
10 deposition is going on and is prepared to
11 deal with matters pertaining to his court
12 today.
13 MR. SHIPLEY: Just for the record,
14 Union Carbide is not a party to the lawsuit
15 that Mr. Lanier has just referenced, and
16 we're not voluntarily making any appearance
17 in that case.
18 MR. BICKS: My name is Peter Bicks.
19 I'm from Orrick, Herrington, and we're here
20 on behalf of Union Carbide and Mr. Sayers.
21 Just for the record, Mr. Lanier, can
22 we have the folks who are with you identify
23 themselves or would you please be kind
24 enough to identify them so we know who's
25 here for purposes for the record?

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2 MR. LANIER: Sure.
3 That's David Egilman. He is an expert
4 witness of mine, and he's a doctor. He
5 spells his name E-G-I-L-M-A-N. I thought
6 everybody knew David, but they may not have.
7 Next to him is Will Lanier. He's my
8 son, who's up here looking at colleges and
9 looked at Columbia. And I assume, since he
10 does work also for my office, that no one
11 will have an objection to him being up here.
12 And I expect y'all to be on your best
13 behavior because he's learning how lawyers
14 behave.
15 Next to him is Kevin Parker. Kevin
16 Parker is a lawyer from Houston, Texas. He
17 is board-certified in appellate law, has
18 been my best friend since like ninth grade.
19 Next to him is Dara Hegar, H-E-G-A-R.
20 She's a real nice lady. She's a lawyer down
21 in Houston, Texas, and also works for my
22 firm.
23 This is Arnie Levinson. Arnie is fast
24 becoming a good friend of mine. He's from
25 San Francisco. He's a named partner with a