Venezia Reporting and Video Services

1017 OLIVE STREET • SUITE L-2 • ST. LOUIS, MO. 63101 • 421-3008 • FAX 421-6540

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARKWRIGHT MUTUAL INSURANCE COMPANY, Plaintiff,	)	
VS	)	90 CIV. 7811 (KC)
	)	89 CIV. 8063 (KC)
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, Defendant.	)	

DEPOSITION OF THOMAS M. BISTLINE
TAKEN ON BEHALF OF THE DEFENDANT
APRIL 29, 1992

COPY

INDEX: Page 2
REPORTED BY L. ED PATTERSON

WATER_PCB-SD0000066669

I N D E X

Index. . . . . .page 2

Deposition Information . . . . . .page 3

Appearances. . . . . .page 4

Stipulation. . . . . .page 5

Direct Examination . . . . . .page 5

by Mr. Janatka

Exhibit Number 1 Marked. . . . . .page 9

Final Page of Testimony. . . . . .page 31

Group Exhibit Number 2 Marked. . . . . .page 31

Signature Page . . . . . .page 32

Notarial Certificate & Seal. . . . . .page 33

Notification Letter. . . . . .page 34

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARKWRIGHT MUTUAL INSURANCE COMPANY, Plaintiff,	)	
VS	)	90 CIV. 7811 (KC)
	)	89 CIV. 8063 (KC)
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, Defendant.	)	

DEPOSITION OF WITNESS, produced, sworn and examined on the 29th day of April, A.D., 1992, between the hours of eight o'clock in the forenoon and six o'clock in the afternoon of that day at the law offices of KORTENHOF & ELY, 1015 Locust Street, Suite 500, in the City of St. Louis, State of Missouri, before L. ED PATTERSON, a Shorthand Reporter and Notary Public within and for the State of Missouri, in a certain cause now pending in the United States District Court, Southern District of New York, between Arkwright Mutual Insurance Company, Plaintiff, versus National Union Fire Insurance Company of Pittsburgh, PA, Defendant, taken on behalf of the DEFENDANT.

WATER_PCB-SD0000066671

A P P E A R A N C E S

The Plaintiff was represented by Ms. Stephanie M. Holzback, Esq., of the law firm of NEWMAN & BOWER, P.C., 425 Lexington Avenue, New York, New York 10017; (212) 916-3660

The Defendant was represented by Mr. Joseph J. Janatka, Esq., of the law firm of CLAUSEN, MILLER, GORMAN, CAFFREY & WITOUS, P.C., 10 South LaSalle Street, Chicago, Illinois 60603; (312) 855-1010

S T I P U L A T I O N

IT IS HEREBY STIPULATED AND AGREED, by and between Counsel for the parties, that this Deposition may be taken in stenotype by L. ED PATTERSON, a Shorthand Reporter within and for the State of Missouri, and afterwards transcribed into typewriting, and signed by the witness.

*****

THOMAS M. BISTLINE,

of lawful age, being first duly sworn to tell the truth, the whole truth, and nothing but the truth, deposes and says in behalf of the DEFENDANT, as follows:

DIRECT EXAMINATION

QUESTIONS BY MR. JANATKA:

Q Sir, could you please state your name for the record?

A My name is Thomas M. Bistline.

Q And, spell that for me?

A It's B as in baker -I-S-T-L-I-N-E.

Q For the record, this is the Deposition of

Thomas Bistline taken pursuant to notice and continued to today's date.

This is taken for all allowable purposes under the Federal Rules of Civil Procedure.

Today is strictly a documents Deposition; we are taking your Deposition as the keeper of the records for Monsanto. We are going to reserve our right to re-depose you, or anyone else from Monsanto in the event that it becomes necessary for a discovery Deposition.

A I understand that.

Q Have you given a Deposition before?

A Yes, I have.

Q So, you are familiar with the process?

A Oh, yes.

Q Okay. I am just going to be asking you today about records produced pursuant to a subpoena that Clausen and Miller on behalf of National Union Fire served upon Monsanto.

If you don't understand any of my questions, please tell me, and I will be happy to rephrase them.

A Certainly.

Q And, if you would like at anytime to take a break, please let me know.

A Very good.

Q Where are you employed, sir?

A Monsanto Company.

Q What is your position at Monsanto?

A I am Assistant General Counsel for Litigation.

Q Are you an attorney?

A Yes.

Q How long have you been employed with Monsanto?

A A little over ten years now.

Q Have you always held the position of Assistant General Counsel?

A No, I have not. I have held lower ranking positions.

Q Could you briefly describe your employment with Monsanto?

A I began my employment at Monsanto in approximately February of 1982. My position then was Litigation Attorney.

Approximately two years after that, or about 198 -- late '83, a year and a half, I was promoted to Assistant Litigation Counsel.

In 1986, I was promoted to Litigation Counsel.

And, in 1990, I was promoted to Assistant General Counsel for Litigation.

Q What are your duties and responsibilities as Assistant General Counsel for Litigation?

A I supervise or manage for Monsanto certain areas of litigation in which the company is involved.

I have certain administrative duties within the Law Department as well.

Q Without detailing, is there a general description for those various areas of litigation?

A There is nothing written down if that is what you mean, sir. We try to divide up the work among the lawyers in the litigation group as best we can, and I have, for example, I am responsible for the PCB litigation, which results in my being the Custodian of Records for the records being produced here today.

Q Is it fair to say that you have been responsible for PCB litigation since 1990?

A Since approximately January of '85.

Q Did you receive a subpoena and rider in connection with your Deposition today?

A Yes, I did.

Q You have that with you?

A Yes, I do.

MR. JANATKA: Go ahead and mark that as Exhibit 1.

(At this time, a document, a Subpoena and Rider, was marked as Defendant's Exhibit Number 1.)

Q (by Mr. Janatka) Did you have an opportunity to examine the subpoena and the rider prior to coming here today?

A Yes, I did, you are referring to Exhibit 1?

Q Right.

A Right.

Q Have you brought with you documents responsive to the subpoena and the rider today?

A Yes, I have.

Q I see approximately, I see six, what I would call, banker's boxes full of documents, are those the documents that are responsive?

A Those are, that is two sets of documents.

Q What do you mean by two sets?

A Two copies of the documents that were requested by the subpoena.

MR. JANATKA: Let's go off the record.

(At this time, there was an off-the-record discussion.)

Q (by Mr. Janatka) During our discussion just off the record, apparently Monsanto has produced a set of records for the Plaintiff as well as the Defendant?

A That is correct.

Q Could you describe for me how the documents were assembled?

A When the subpoena came in, I consulted with my paralegal, chief paralegal, Ms. (Niblock), and directed her to retrieve from the documents in my custody as Custodian of PCB records for Monsanto, documents which would respond to the description in the subpoena which is Exhibit 1 here.

Ms. (Niblock) then caused members of the staff that works for her to retrieve those records from the documents that I have in my possession, and to prepare them for production here today.

Q Okay. Who is Ms. (Niblock)?

A Ms. (Niblock) is a legal assistant who is employed at Monsanto and who generally is in

charge of the paralegals and clerical employees who help support PCB litigation.

Q She works for you?

A Well, she reports to me, yes.

Q How long has she worked, or reported, to you?

A About five years.

Q Has she performed functions similar to what she has done in connection with this litigation, in other words, has she been responsible for assembling documents in the past?

A Many times, that's her main duty.

Q Do you know where the documents came from, in other words, are they stored in a central file system at Monsanto?

A Let me respond to it in this way.

Monsanto ceased production of PCB in 1977. Since that time, all documents relating to our manufacture and sale of PCBs have been in the custody of the Law Department since there was no longer any business use for them.

The documents are retained at this point solely for litigation purposes, and therefore, as the person in charge of litigation, they are in my custody.

Those documents which we have are all located in one spot.

Q Is there a record retention policy with regard to PCB related documentation?

A Yes, that record retention policy is that we do not destroy any documents that we have related to PCBs.

Q Are there dates on either side of that no destruction rule?

A It's hard to respond to the question as you have phrased it, sir.

Q What is the earliest time which you would be able to obtain a document relating to PCBs?

A Well, we have documents relating to PCBs that go back to the 1940s certainly.

I'm not saying, though, that all the documents that were created from the 1940s to present have been retained.

PCB related documents in general were removed from the regular retention, record retention program, at Monsanto in about 1973, '74, somewhere along in there.

Q So, if I'm understanding you, you may be, your policy may cause retention of documents as old as approximately 1940, although not

necessarily that early?

A Let me state it this way.

In about 1973 or 1974, direction was given to Monsanto employees to remove from the regular record retention policy of the company all documents then in their possession, or thereafter created, which relate to PCBs.

And, to the best of our abilities, we have followed that policy, and those records, those documents are in the possession of whoever it is at the time who happens to be the custodian of records of PCBs.

Q And, today that happens to be you?

A Today that is me.

Q Did you have an opportunity to examine the documents that you are producing today?

A Yes, I looked at them.

Q Are there any documents which were originally assembled in response to the subpoena and rider which have been removed from production?

A By originally assembled, I'm not quite sure what you mean.

My staff looked at the documents that generally correspond to the request that you made here. In general, they review sales records, and

they selected from those sales records those records which reflected purchases of PCBs by General Electric or Borg Warner, those documents have been produced.

Q Are any documents reflecting sales of PCBs or PCB related items to Borg Warner or General Electric being withheld?

A On a claim of privilege?

Q Yes.

A No.

Q Any other type of claim?

A No, to the best of my knowledge, and information, all documents we found were produced.

I might add we have also added into the production what we call a sales summary sheet, which explains or summarizes the sales of the PCB related products by sales location for General Electric and Borg Warner.

That document was prepared by a number of my staff.

Q Who prepared that?

A Mr. John Lee.

Q At your direction?

A At my direction.

Q Aside from you, Mr. Lee and Ms. (Niblock)

and her staff, has anyone else been contacted or employed in assembling the documents responsive to the subpoena?

A No, so long as we include the people on our staff who physically copied and numbered the documents.

Q Are the documents which you are providing today kept in any particular order?

A They are generally kept in an archive in a fashion which responds in some instances to the manner in which they were kept by the people from whom they were collected at the time they were obtained from the Law Department.

In other cases, the documents were obtained from storage, in our long term storage facility, and in other cases, depending upon the type of documents involved, of course, the documents would be from a library or something like that, and just put in some order in which they were collected into the archives.

Q Does Monsanto maintain a library related to PCBs?

A Not just related to PCBs.

Q It relates to other products or subjects, as well?

A Well, first of all, we have many libraries at Monsanto, so the library I had in mind when I was speaking of the documents obtained from the library would be what we call our medical environmental health library.

Q Do you know what types of things are kept in the environmental health library?

A Generally studies conducted by or for Monsanto on its products or other substances of interest to Monsanto. And, in some cases, copies of scientific articles in general circulation.

Q Do you know approximately how many pages you brought with you today?

A Approximately seven thousand, somewhere around seven, seven thousand, seventy-five hundred, times two.

Q Correct.

Now, as we go through the boxes, are the documents assembled in the boxes here today kept in any kind of order which would assist us and make this more efficient?

A Well, the documents are grouped by sales location, so that all the documents which pertain to the sale of PCB products to a particular location are grouped and fronted by a summary

sheet.

Q Why don't we open up one set.

A This one here on top?

Q Whatever.

Just to confirm, sir, you have had an opportunity to at least examine the documents that are being produced today?

A Yes.

Q Have you examined them in detail?

A I have not looked at every single page, no.

Q Were you at anytime in your career at Monsanto involved in the sale of PCB or PCB related materials?

A No, sir.

Q Do you know the name of the individuals who would have been involved in the sales?

A I know some of them, yes.

Q Who are those individuals, if you recall?

A The first name that leaps to mind is Mr. William Papageorge.

Q Anyone else?

A Mr. Paul Benignus.

Q Anyone else?

A I'm not sure whether he was involved in

any of these sales, but Mr. Norman Johnson.

There are, obviously, other people who were involved, but I can't on the spur of the moment recall the names.

Q Do you know with regard to the documents you are producing here which represent documents involving the purchase of PCB containing products by General Electric or Borg Warner who was involved in the sale of PCBs reflected in these documents?

A No, sir, I don't.

Q Is Mr. Papageorge still with Monsanto?

A No, he is retired.

Q Mr. Benignus, is he still with Monsanto?

A He also is retired.

Q How about Mr. Johnson?

A Mr. Johnson is also retired.

As you might imagine, this is a product whose history goes back many years, and most of the people involved are retired.

Q Just so we are clear, Monsanto ceased production in 1977?

A That's correct.

Q If you don't mind, I would like to come over on your side of the table and stand next to

you.

A Be my guest.

Q I think what I would like to do now is, with the understanding of Ms. Holzback, we have got three banker's boxes representing one set of documents produced, and I would like to have it marked as Group Exhibit 2, in lieu of marking every piece of paper we look at.

Apparently they have been bate stamped beginning with ARK01. If I refer to any particular document, I'll refer to the bate stamp number, is that all right?

MS. HOLZBACK: That's fine.

Q (by Mr. Janatka) Sir, you have pulled out the first folder from box one of three beginning with ARK001?

A Yes.

Q What are we looking at as ARK001?

A ARK001 is a document entitled sales summary, all PCB containing products General Electric Company unknown location 1954 to 1977 reflecting certain sales of PCBs.

Q And, attached to ARK001, what are we looking at?

A A document bate stamped ARK00002 is a

computer generated summary of sales from the years 1954 which refers to General Electric Company, and product (Pyronoll) 1467.

Q When did the computer generated printout, when was that made?

A This particular computer generated printout would have been made sometime probably early 1955.

This is the year-end summary document that was generated to compile sales data.

Q Is that normally how sales data is compiled on a yearly basis?

A Yearly by product, by customer, yes.

Q And, ARK0003 represents what?

A That is also part of that customer sales, this is a monthly customer sales tabulation reflecting sales, let me see if I can find the month on it here, I can't identify the month, but it is from 1954.

MR. JANATKA: Off the record.

(At this time, there was an off-the-record discussion.)

Q (by Mr. Janatka) Mr. Bisline, just

to kind of summarize how these documents are put together for production today, can you do that for us again on the record?

A Sure.

What we tried to do here is to compile, as I said earlier, by location of sales, or in some cases as you see, unknown location when we don't have sales location information. The sales of PCB related products to GE or Borg Warner.

For reasons that I think probably appear best known to my staff, we have several unknown locations, but then as we get back to about document numbered ARK00020, we begin to get, or begin to see, specific locations for the sales of products.

The documents that are attached in most cases to the sales summary sheet are the documents which support the sales reflected on that summary.

And, I asked my staff, we do this when, we generally do this when asked for sales information, because the documents themselves are difficult in some cases to interpret.

Q So, your staff has put together the cover sheets entitled Sales Summary?

A Yes.

Q And, attached to those are either computer printouts of the sales data, or monthly data sheets, is that correct?

A Or perhaps an actual sales invoice where such a document was available.

Q And, your ability to interpret the computer printouts, sales invoices and the like, is limited to actually what is shown on the sales summary, is that correct, your personal ability?

A My personal ability, there are cases where I may not even be able to interpret the sales that the supporting detail data to arrive at the number here, you know, if there is a question about it, we can certainly respond to that.

But, I don't represent to you that I, as I stand here today, that I can go through each one of these and verify the arithmetic involved at arriving at a total for the sales by location. A member of my staff, Mr. Lee, is an expert at that.

Q Do you have any knowledge of the value in pounds of PCB or PCB related products sold to General Electric or Borg Warner from the period of 1950 to 1977?

A '77 was the last year we sold PCB related products, and we did sell to General Electric at

the time, and I don't know if we sold to Borg Warner, and I don't know, sir, what the grand total is.

Q Would anyone at Monsanto know the grand total?

A Not, probably not without going through and adding up all the sales summaries.

Q And, in examining these documents prior to production, do you recall, sir, whether you saw any record related to sales of PCB or PCB related materials to the Borg Warner Woodmar Plant which subsequently became the GE Plant in Washington, West Virginia?

A I don't know, if we have such documents, they are contained within this grouping here.

Can we go off the record?

(At this time, there was an off-the-record discussion.)

Q (by Mr. Janatka) So the documents have been provided in roughly an alphabetical fashion?

A That was the intent.

Q For the record, we are currently looking

through the box of documents to see if we can locate documents related to Borg Warner?

A The only sales for West Virginia that I see here are just Charleston.

MS. HOLZBACK: Is that Borg Warner?

A That's GE, General Electric Company.

Q (by Mr. Janatka) What are you looking at, sir?

A I'm looking at documents from folder 12.

Q And, what are the bate numbers on those?

A The Charleston, West Virginia?

Q Yes.

A It begins at document ARK7633 through 7697.

Q And, ARK7633 through 7697 represents sales summaries and attachments for the sales of PCB contained products to General Electric in Charleston, West Virginia through 19, from 1954 through 1977, correct?

A That is correct.

Q And, you are able also to locate some documents which we referred to as Borg Warner, is that correct?

A That is correct.

Q And, what are those documents numbered?

A Those documents are numbered ARK007763 through 7776 from production folder 13.

Q And, these are sales summaries of PCB containing products sold to Borg Warner from 1954 to 1977 for unknown location, that's ARK7763; for Muncie, Indiana, that's ARK7765; New Castle, Indiana, that's ARK7768; and for York, Pennsylvania, ARK7774, is that correct?

A That is correct.

Q Were you able to locate any other documents which referred to Borg Warner?

A No, these are the only documents relating to sales of PCB products to Borg Warner that my staff was able to locate.

Q Would you like time to look additionally, or do you feel pretty confident about that?

A If they did their job, and I presume they did, the sales, as I indicated, should be organized alphabetically by State, and separated between GE and Borg Warner; that was my understanding of how they were supposed to organize them.

We can go through all of these if you want to.

MR. JANATKA: Off the record.

(At this time, there was an off-the-record discussion.)

Q (by Mr. Janatka) Back on the record.

We also located at the very beginning from production folder number 1 sales summary sheets from ARK001 through ARK0019, documents representing sales of PCB containing products by Monsanto to General Electric Company from 1954 through 1977 at an unknown location, is that correct?

A That is correct.

Q Now, if you will bear with me, sir, I would like to take a moment to briefly look through the documents, and I will have additional questions to follow-up on them.

A Sure.

Q We have located through looking through these boxes fairly quickly ARK7633 which is the sales summary for PCB containing products sold to General Electric Company, apparently Charleston, West Virginia, from 1954 through 1977, is that a correct intepretation of ARK7633, sir?

A Yes.

Q And, attached to that sales summary, ARK7635 through ARK7657 are what?

A Those are documents which support sales summary which is pages ARK7633 and 34, I think there may be other supporting documents here as well, with the supporting documents for this sales summary, ARK7633 and 34 continued until you get to the next sales summary, wherever that is, way down here, it looks like 7695.

All of these would support this sales summary.

Q And, again, your function as records custodian was to oversee the assembly of these documents, is that correct?

A That is correct.

Q Not necessarily to interpret them?

A That's correct.

Q The information contained in the documents?

A That is very correct.

Q And, that is from production folder 12 that we were discussing, is that correct?

A Yes, sir.

Q Let me see if I have any further questions, perhaps opposing Counsel does.

And, the documents that you produced to us today, they were kept at Monsanto prior to production, correct?

A Correct.

Q And, they are kept in the ordinary course of business?

A To the extent that one can say keep documents for litigation in the ordinary course of business, yes.

Q Were these documents generated by employees of Monsanto?

A That is correct.

Q And, such documents are normally generated by the employees of Monsanto, is that correct?

A That is correct.

Q And, these documents were at one time?

A Yes, that is correct.

Q Does Monsanto maintain any, for lack of a better description, physical evidence regarding PCB or PCB related products?

A I'm not quite sure what you mean by physical evidence?

Q Other documents, does Monsanto maintain --

A Samples of the products?

Q Samples of the products?

A I'm not aware of any.

Q And, just to clarify, from your review of these documents, were you able to determine who the sales agent at Monsanto was for sales of PCB related products to General Electric or Borg Warner?

A No, sir.

Q Do you know what those products were used for at General Electric or Borg Warner?

A Borg Warner I'm not familiar with.

For General Electric, by and large, the products that were sold were used for dialectic purposes for use in transformers or capacitors or magnets and switches.

Q Any other purposes that you recall?

A Without reviewing each record product by product, I couldn't say right here, but the predominant use of the products sold to GE was for dialectic purposes.

Q Is there any individual at Monsanto who would be in the position to examine the documents produced today and summarize them in terms of the purpose for which the PCBs were sold?

A If I could phrase that slightly

differently, if you mean the usage to which those kinds of products were put?

Q Yes.

A I think possibly Dr. John Craddock could do that.

Q Dr. John Craddock is employed with Monsanto?

A He is a current Monsanto employee, yes.

Q And, what is his position?

A Product Safety Manager, I believe is his title.

Q Is he here in St. Louis?

A Yes.

MR. JANATKA: I don't have anymore questions, sir, thank you.

MS. HOLZBACK: I have no questions.

MR. JANATKA: Mr. Bistline, as you probably know, you have the right to read and examine your Deposition Testimony after it's typed up by the Court Reporter, or you can waive that right, it's up to you.

A I would like to see the Deposition and have a chance to look at it.

MR. JANATKA: So, you would reserve your signature?

A I would like to reserve signature, yes.

(At this time, a group of documents were marked as Defendant's Exhibit Number 2.)

I, THOMAS M. BISTLINE, do hereby state that I have read the foregoing questions and answers appearing in this transcript of my Deposition; that this is a true and accurate report of said answers given in response to the questions appearing herein.

IT IS FURTHER STIPULATED AND AGREED, by and between Counsel, that this Deposition may be signed before any Notary.

_____

THOMAS M. BISTLINE

(REPORTED BY L. ED PATTERSON)

C E R T I F I C A T E

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

Before me personally appeared THOMAS M. BISTLINE, known to me to be the person described in and who executed the foregoing instrument and acknowledged to and before me that he executed the said instrument in the capacity and for the purpose therein expressed.

WITNESS my hand and official seal this 4th day of June, A.D., 1992.

_____
NOTARY PUBLIC
State of Missouri

JOSEPHINE S. NIBLOCK
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP. JAN. 15,1995

My Commission expires: _____.

WATER_PCB-SD0000066700

NOTARIAL CERTIFICATE

STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

I, L. Ed Patterson, a Shorthand Reporter and Notary Public within and for the State of Missouri, do hereby certify that pursuant to notice came before me at the law offices of KORTENHOF & ELY, P.C., 1015 Locust Street, Suite 500, in the City of St. Louis, State of Missouri,

THOMAS M. RISTLINE,

who was by me first duly sworn to testify the whole truth of his knowledge, concerning the matter in controversy aforesaid, that he was examined, and his examination having been reduced to shorthand writing by me, on the day, between the hours, at the place, and in that behalf aforesaid, and later his testimony was transcribed into typewriting, and his signature thereto having been witnessed by a suitable Notary Public, his Deposition is herewith returned to the Court.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my Notarial Seal on this 27th day of May, A.D., 1992.

My Commission will expire June 26th, 1994.

_____
L. ED PATTERSON
Notary Public
State of Missouri

WATER_PCB-SD0000066701

May 27, 1992

Mr. Thomas M. Bistline
Assistant General Counsel
MONSANTO COMPANY
800 North Lindbergh Boulevard
St. Louis, Missouri 63167

IN RE: Arkwright Mutual vs National Union
Deposition of Mr. Thomas M. Bistline

Dear Mr. Bistline:

This letter, incorporated as the last page of your Deposition, will serve as notice to you that your testimony given in the above matter is now ready for reading and signing of same.

At your earliest convenience, please read the enclosed copy of your Deposition, making any corrections you deem necessary, on the enclosed errata sheet; sign the signature page; and return both to me so that I may then file the Original of your Deposition with the Court.

If I have not heard from you within thirty (30) days from the date of this letter in regard to this matter, I will then file the Original of your Deposition with the Court, along with an affidavit stating my offer of submission of your Deposition to you for reading and signing, and your refusal to do so.

Thank you very much for your cooperation in this matter.

Cordially,

L. Ed Patterson

L. ED PATTERSON, Associate
VENEZIA Reporting & Video Services
1017 Olive Street, Suite L-2
St. Louis, Missouri 63101

(314) 421-3008

MAY 29 1992

WATER_PCB-SD0000066702

CORRECTION SHEET

Page	Line	Correction	Reason
15	13	obtained by the Law Department	mistranscription
20	3	product Pyranol 1467	misspelling
22	12	sales from the supporting	misspoke
28	7-8	say keeping documents for litigation is in	
		the ordinary course of	mistranscription
29	13	used for dielectric	misspelling
29	20	dielectric purposes	misspelling

WATER_PCB-SD0000066703