

CAUSE NO. 25093

LARRY C. WHATLEY, Individually
and as Personal Representative of the
Heirs and Estate of GLENN WHATLEY,
Deceased. et al

VS.

ALCOA POWER MARKETING, INC.,
et al

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IN THE DISTRICT COURT OF

MILAM COUNTY, TEXAS

20TH JUDICIAL DISTRICT

PLAINTIFFS' AMENDED NOTICE OF INTENT TO TAKE VIDEOTAPED DEPOSITION

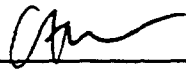
TO ALL DEFENDANTS AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to the Texas Rules of Civil Procedure, Plaintiffs will take the videotaped deposition of Thomas Bonney on Wednesday, February 25, 1998 at 10:00 a.m. at the offices of LeBoeuf, Lamb, Greene & MacRae, 601 Grant Street, Pittsburgh, Pennsylvania 15219, (412) 594-2300 before a certified court reporter provided by Guyton Court Reporting, 262 North Belt East, Suite 200, Houston, Texas 77060, (281)999-4992. Guyton Court Reporting will also provide the videotaped technician.

The deposition will continue from day to day until completed. Additionally, notice is further given that the request is made as authorized under Rule 201 of the Texas Rules of Civil Procedure that the witness is required at the time of his deposition to produce the documents listed in the attached Exhibit "A."

Respectfully submitted,

LAW OFFICES OF ANDREW WATERS

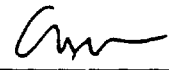


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by facsimile to all counsel of record on this 18th day of February, 1998.



C. ANDREW WATERS

EXHIBIT "A"

1. Any and all documents reviewed in preparation for depositions related to asbestos cases.
2. Any and all documents reviewed during the last 6 months regarding asbestos.
3. Any and all prior depositions and exhibits attached thereto, given by the witness.
4. Any and all training manuals and other written materials, articles, textbooks, notes, etc. related to asbestos and/or the hazards thereof and in the witness' possession and/or control.