

1 counsel's assumption because there's some
2 handwritten comments on the document that it
3 indeed relates to 1984.

4 MR. CIFALDI: I understand, but you
5 produced the document, not me, and --

6 MR. KUNDLA: The fact it is produced
7 and because someone has a handwritten comment on
8 it doesn't indicate it relates to 1984. You
9 have to first lay a foundation with the witness
10 whether it is the case.

11 MR. CIFALDI: Could you tell me what
12 document that refers to, if you supplied --

13 MR. KUNDLA: At this juncture I don't know
14 the date of the form you have. I'm saying, for
15 purpose of the testimony of this witness at
16 this time who does not know, or indicated he
17 does not know why it says 1984 in there, I'm
18 making that clear on the record.

19 MR. CIFALDI: I would like to request that
20 document be identified and the source specified.

21 MR. KUNDLA: Fine.

22 Q Review paragraph 3, please.

23 A All right.

24 Q Are you aware if any documents responsive
25 to that request were produced here today?