

FROM BAKERBOTTSLLP

(TUE) 7. 30' 02 11:30/ST. 11:28/NO. 4860402333 P 3

deposition of her social worker pursuant to Rule 30(a)(2)(c) as the social worker was planning to move to Japan the month after suit was filed); *Cargill v. M/V Minos*, C.A. No. 96-251, 1996 WL 32524, at *1 (E.D. La. Jan. 23 1996) (permitting depositions, document review, and vessel inspection in maritime collision case where vessel and crew were scheduled to leave the United States shortly). As a Rule 26 conference has not been held in this case yet, Union Carbide sets forth the following facts in support of this notice:

- (1) Ian Sayers was born on May 10, 1939 in the United Kingdom.
- (2) Ian Sayers has resided in the United Kingdom his entire life, except for a two-year period in the 1960s when he lived in Belgium.
- (3) Ian Sayers was formerly a salesman employed by Union Carbide.
- (4) Ian Sayers currently resides near Manchester, England.
- (5) Ian Sayers is noticed to be deposed in other litigation on Friday, August 2, 2002, at 9:00 a.m. E.D.T., at the offices of Orrick, Herrington & Sutcliffe, L.L.P. 666 Fifth Avenue, New York, NY 10103-001.
- (6) On August 3, 2002 or shortly thereafter, Ian Sayers is expected to return to his home in England and is not expected to return to the United States before trial in this matter.

As this deposition is being cross-noticed with *In re Minnesota Personal Injury Asbestos Cases*, Union Carbide gives notice that parties to those cases will also attend the deposition.