

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON, WEST VIRGINIA

JAMES M. ADKINS, Administrator
of the Estate of Ralph E. Adkins,
Deceased, et al,

Plaintiffs,

vs.

MONSANTO COMPANY, a Delaware
Corporation,

Defendant.

No. 81-2098

Deposition of
ROBERT C. ISHAM
taken on behalf of
THE PLAINTIFFS.

* * * * *

Reporter: M. Joy Springer

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APPEARANCES:

Paul L. Pratt, Esq.,

For the Plaintiffs;

Messrs. Bowles, McDavid, Graff & Love,
by P. Michael Pleska, Esq.,

For the Defendant.

IT IS STIPULATED AND AGREED by and between
counsel for the plaintiffs and counsel for the defendant
that the deposition of ROBERT C. ISHAM may be taken
pursuant to Rule 26(a) of the Federal Rules of Civil Pro-
cedure, on behalf of the plaintiffs, on June 30, 1983, at
the Radisson Hotel, Room 215, 9th Street and Convention
Plaza, St. Louis, Missouri, before M. JOY SPRINGER, a Notary
Public within and for the County of Madison, State of

1 Illinois; that the issuance of notice and dedimus is
2 waived, and that this deposition may be taken with the same
3 force and effect as if all Federal rules and statutory
4 requirements had been complied with.

5 IT IS FURTHER STIPULATED AND AGREED that any
6 and all objections to all or any part of this deposition
7 except objections as to form of the questions asked or
8 answers given, are hereby reserved and may be raised on the
9 trial of this cause; and that the signature of the deponent
10 is not waived.

11 * * * * *

12
13
14
15 ROBERT C. ISHAM

16 produced, sworn and examined on behalf of the plaintiffs,
17 deposes and says as follows:

18 EXAMINATION
19

20 BY MR. PRATT:

21 (Whereupon the reporter marked Plaintiff's
22 Deposition Exhibit #160 (Monsanto's I.D.
23 #8322866 and 8322867), consisting of two
24 pages; Plaintiff's Deposition Exhibit #161
25 (Monsanto's I.D. #236182 through 236186,

1 inclusive), consisting of five pages;
2 Plaintiff's Deposition Exhibit #162 (Monsanto's
3 I.D. #8322358); Plaintiff's Deposition Exhibit
4 #163 (Monsanto's I.D. #8326208 through 8326211,
5 inclusive), consisting of four pages; Plain-
6 tiff's Deposition Exhibit #164 (Monsanto's
7 I.D. #8326240 and 8326241), consisting of two
8 pages; Plaintiff's Deposition Exhibit #165
9 (Monsanto's I.D. #8322873 and 8322874), con-
10 sisting of two pages; Plaintiff's Deposition
11 Exhibit #166 (Monsanto's I.D. #8323064), con-
12 sisting of one page; Plaintiff's Deposition
13 Exhibit #167 (Monsanto's I.D. #8331253
14 through 8331259, inclusive, and 8331262
15 through 8331271, inclusive), consisting of
16 seventeen pages; Plaintiff's Deposition Exhibit
17 #168 (Monsanto's I.D. #8331262), consisting of
18 one pages; and Plaintiff's Deposition Exhibit
19 #169 (Monsanto's I.D. #231857 through 231860,
20 inclusive), consisting of four pages.)

21 Q Tell us your name, will you, please?

22 A Robert C. Isham, 253 Heather Crest Drive,
23 Chesterfield, Missouri, 63017.

24 Q And how old a man are you, sir?

25 A I'm forty-four.

1 Q Okay. You would have graduated from high
2 school in what year?
3 A 1957.
4 Q Okay. Following that did you go to college?
5 A I did. To the Pennsylvania State University
6 where I received a degree in business psychology.
7 Q Okay. You would have graduated what year,
8 then?
9 A 1961.
10 Q All right. Following that what did you do?
11 A I was commissioned in the U. S. Coast Guard
12 and served in the Coast Guard for three years, at which time
13 I separated and joined Monsanto in 1965.
14 Q 1965?
15 A Yes.
16 Q Okay. What did you do in the Coast Guard,
17 what was your job, MOS?
18 A I was a line officer and assigned to a boot
19 camp, a receiving center which I was involved in personnel
20 and classification work.
21 Q Okay. Where would that have been?
22 A In Cape May, New Jersey.
23 Q When you came to work in Monsanto -- what
24 was the year?
25 A 1965.

1 Q What was your first job?
2 A I was a copywriter.
3 Q Okay. In what department?
4 A In the Corporate Advertising Department.
5 Q What did that involve?
6 A It involved writing catalogue copy for a
7 products catalogue.
8 Q Okay. How long were you in that position?
9 A Approximately seven months.
10 Q And what new position did you get then?
11 A My next job was an advertising supervisor
12 in the Organic Chemicals Division.
13 Q And how long were you in that job?
14 A Approximately two years.
15 Q That would get us up to what? About 1968?
16 A Approximately.
17 Q What I'm trying to get at, Mr. Isham, is
18 just a chronology of your jobs and what you did. What was
19 your next job?
20 A Advertising Research Manager in the
21 Corporate Advertising Department.
22 Q What were your duties there?
23 A I was to measure and evaluate public opinion
24 and the effectiveness of advertising campaigns.
25 Q Okay. How long were you in that position?

1 A Approximately two years.

2 Q That would get us up to about 1970?

3 A Yes.

4 Q And what became your position then?

5 A I became Manager of Chemicals Advertising
6 and Sales Promotion in the Corporate Advertising Department.

7 Q Okay. And what were your duties and
8 responsibilities there?

9 A I was responsible for all chemicals adver-
10 tised and sales promotion and merchandising.

11 Q How long were you in that job?

12 A Approximately two years.

13 Q That would get us up to about --

14 A -- 1972.

15 Q What position did you have during that time?

16 A 1972 I was appointed Director of Advertising
17 for Monsanto Industrial Chemicals Company. As such I was
18 responsible for all advertising programs of this operating
19 unit of Monsanto.

20 Q Okay. And how long were you in MIC?

21 A I received additional responsibilities in
22 1977 when I picked up the public relations function, and my
23 title was amended to Director, Advertising and Public
24 Relations, Monsanto Industrial Chemicals Company.

25 Q Okay. And what was your job there at that

1 point, '77?

2 A I was responsible for all advertising and
3 public relations program of this operating unit at Monsanto.

4 Q Okay. Now, how long were you in that job,
5 sir?

6 A Until January 1st, 1983, at which time I was
7 appointed Advertising and Marketing Information Director in
8 the Corporate Advertising Department.

9 Q What are your responsibilities now?

10 A I am responsible for coordinating inter-
11 national advertising and supervising a marketing information
12 center that provides information on our products to customers
13 as well as individual's consolidated sales statistics to our
14 executive management.

15 Q Now, during the '60's, say, from '65 to '70,
16 did you do any of the type work you do, which was adver-
17 tising and supervision of Organic Chemicals Division, any
18 work involving the manufacture of 2,4,5 T at Nitro?

19 A No.

20 Q During the period 1970 to 1972 when you were
21 Manager of Chemical Advertising, I believe, did you do any
22 work involving any of the chemicals being made at Nitro?

23 A Yes.

24 Q Which ones?

25 A Rubber chemicals.

1 Q And do you know what chemicals would be
2 involved? Would Niran be one?

3 A Niran?

4 Q Yes.

5 A That is a product that we never advertised
6 during that period of time, 1970 to 1972.

7 Q What products did you advertise that were
8 made at Nitro?

9 A The products we advertised were promoted
10 under a family umbrella rather than individual products, so
11 we talked about Monsanto's capabilities in the area of
12 rubber chemicals, particularly accelerators, anti-degradants,
13 regardless of where the products were produced.

14 Q Actually, your market that you're involved
15 in is to other chemical companies, is it not, or other com-
16 panies?

17 A The primary market for rubber chemicals
18 would be tire manufacturers and the industrial rubber
19 products market, those non-tire production for rubber.

20 Q Your advertisement at that time was not
21 aimed at the general public?

22 A That's correct.

23 Q From 1972 to '77 did any of the advertising
24 work you did -- I think you were Director of Advertising
25 for Monsanto Industrial Chemicals Company, right, at that

1 point?

2 A That's correct.

3 Q Did you do any advertising in regard to any
4 of the chemicals manufactured at Nitro?

5 A Yes, the rubber chemicals.

6 Q Again, the rubber chemicals, okay. In 1977
7 to '83 where you would have been Director of Advertising
8 and Public Relations, MIC Company, now, you did have some
9 advertising involvement involving 2,4,5 T and dioxin at that
10 time, right?

11 A We have a Rubber Chemicals Division in the
12 Industrial Chemical Company, and that is the group of
13 products that I was responsible for.

14 Q However, you did, beginning in '79, you
15 were given copies of public relations data concerning
16 2,4,5 T and dioxin and so forth, isn't that right?

17 A We didn't advertise 2,4,5 T. That's a
18 herbicide. That's not a rubber chemical.

19 Q I understand. Maybe you misunderstood what
20 I'm saying. You were given copies of information that had
21 to do with 2,4,5 T and dioxin that was manufactured from
22 '49 to 1969, isn't that correct?

23 A I don't remember specifically what you're
24 talking about. I was certainly aware of the word "dioxin."
25 I was not aware of 2,4,5 T in 1979.

1 Q Okay. Well, let me ask you -- I mean, you
2 never heard of 2,4,5 T trichlorophenoxyacetic acid in '49,
3 at least, '48, at least, to '69?

4 A I'm now aware of it, but in those days that
5 was not a product in my group that I was responsible for.

6 Q All right. When did you learn that you were
7 manufacturing 2,4,5 T, or the Company was, during that
8 period of time?

9 A I don't remember.

10 Q When did you learn that the 2,4,5 T that was
11 being manufactured contained elements of dioxin?

12 A I don't remember the exact time.

13 Q Can you give us a ballpark figure?

14 A Again, that was an area of the Company that
15 I did not work in, so I don't remember a date when I became
16 aware of it.

17 Q Why would you receive documents involving
18 Monsanto Health Study Task Force?

19 A Under our organization each of the directors
20 of public relations is responsible for certain plants. My
21 responsibility included the Nitro, West Virginia, plant.
22 There was a task force that was appointed that copies me in
23 on their activities; although, I was not a member of that
24 task force.

25 Q Did you ever participate in any of their

1 meetings?

2 A No.

3 Q Would you have read the carbon copies of
4 those documents that were sent to you?

5 A Yes, I would have read those documents.

6 Q Would you have in any way corresponded with
7 other members of this group on what you read?

8 A I can't think of a specific example, but I'm
9 sure we did discuss it.

10 Q Okay. What was the purpose, if you know, of
11 the Monsanto Health Study Task Force?

12 A Since I wasn't on the committee, I don't
13 know. I can only speculate on what I've heard.

14 Q You never participated in any of the
15 meetings, then, I guess?

16 A That's correct, that I'm aware of.

17 Q Let me hand you some documents, Plaintiff's
18 Exhibit #160 through 169 (Monsanto's I.D. #8322866, 236183,
19 8322358, 8326208, 8326240, 8322873, 8323064, 8331253,
20 8331262, 231857, respectively), and ask you to take a look
21 at them.

22 Plaintiff's Exhibits 160 through 169, with two
23 exceptions, and I'll point those out in a minute, show you
24 as receiving a copy of them, right?

25 A That's correct.

1 Q All right. And 162 being an exception, you,
2 apparently, were at a meeting or are shown to have been sent
3 a copy of a meeting, right?

4 A I'm not aware that this shows I was at a
5 meeting.

6 Q 162 is dated March 21st, 1979?

7 A Yes.

8 Q Do you know whether you were at that
9 meeting?

10 A From my interpretation of this memo, I don't
11 see anything about a meeting.

12 Q What would be the difference between being
13 listed as "to" and, you know, on a document and being cc'd,
14 carbon copied?

15 A In my opinion, either one indicates you're
16 supposed to read the memo.

17 Q If it's designated "to," it doesn't mean
18 you were there?

19 A I think there's no clear-cut difference
20 between -- I have my own personal difference, but I don't
21 think there is any generally accepted difference between
22 actually being sent to or carbon copied.

23 Q Then, 168 does not show you as either being
24 designated "to" or cc'd, does it?

25 A Yes. Document 168 shows me as cc, upper

1 right.

2 Q I'm sorry. 167.

3 A Your question was, Mr. Pratt?

4 Q On 167 are you shown as being a person who
5 was designated to receive a document -- yes, on page eight
6 you were receiving a copy of that document.

7 A That's correct.

8 Q Okay. Let me ask you this, how many people
9 -- and I'm talking about executives, not secretaries and
10 things like that -- does Monsanto have in its various public
11 relations departments? Do you have any idea?

12 A In 1979 or today?

13 Q Well, '79, '80, so forth.

14 A I would guess fifty throughout the world,
15 plus or minus ten percent. I'm not sure of the actual
16 number.

17 Q And when they issue a press release, are
18 there certain categories that a release will be made -- by
19 that I mean, certain segments of the public, or do they have
20 any division on that? In other words, if they issued a
21 press release on a study, for example, who all would get
22 that?

23 A When we issue an actual news release, we try
24 to give it as broad as possible dissemination throughout the
25 Corporation and throughout the media. That's the purpose of

1 a news release.

2 Q Right. So would AP, Associated Press, get
3 a copy?

4 A That depends on what we anticipate their
5 level of interest is. In other words, we don't try to bore
6 certain national media with stories we don't think are
7 interesting. If an executive is promoted, for example,
8 that may be appropriate to the home-town press but not the
9 New York Times or the Wall Street Journal.

10 Q I understand. What about when you're
11 talking about studies involving dioxin where you had press
12 releases or news releases, what is the dissemination or the
13 area that you're trying to inform?

14 A It would depend on what the specific subject
15 is. If we are dealing with the work or health at Nitro, I
16 did not make the distribution of those news releases.

17 Q Okay. Well, would that type of release,
18 would that receive nationwide release to various members of
19 the press?

20 A Since I did not issue those news releases,
21 I don't know what the target audience is. I could speak to
22 other examples, but not to this one.

23 Q Give me some examples.

24 A Well, in the event of a new product in the
25 Industrial Chemicals Company, we would probably direct the

1 Q Now, what type of dissemination of a press
2 release would be involved there? Would that be just locally
3 in West Virginia, generally?

4 A My reading of this document 160 does not
5 show any press release. It shows preparing a presentation
6 for the West Virginia Air Pollution Control Commission by
7 Mr. Condray, who worked in the environmental area, to docu-
8 ment what steps the plant had taken to deal with their com-
9 plaint, which was an odor complaint.

10 Q Wouldn't necessarily be a press release,
11 right?

12 A That's correct.

13 Q In Plaintiff's Exhibit 161, page one is a
14 memo from Dan R. Bishop to W. C. Campbell, dated February
15 16th, '79, which you received a copy of, right?

16 A That's correct.

17 Q And it deals with two versions of possible
18 press release for each of you to review, isn't that right,
19 sir?

20 A That's correct.

21 Q And both of those possible press releases
22 contain the following sentences, do they not: "Thirty-seven
23 employees were subsequently referred to Dr. Raymond Suskind,
24 a consulting dermatologist and currently Director of the
25 Kettering Laboratory at the University of Cincinnati." It

1 goes on to state, "Other than dermatitis, no known long-term
2 health effects have been detected from the series of physical
3 examinations offered as part of Monsanto's ongoing health
4 monitoring program." That's what both those tentative
5 releases contained, that language.

6 A I see that language, yes.

7 Q Do you know in fact whether this press
8 release was issued?

9 A No, I do not.

10 Q Has it been, as far as you know, as part of
11 the corporate public relations, has that been their position
12 all through this business of dioxin?

13 A Would you repeat the question?

14 Q Yeah. While you have been in public rela-
15 tions, has that been, the sentence that we just read on page
16 two of Plaintiff's Exhibit 161 and on page four and five,
17 has that been the Company's position all the way through
18 that on those thirty-seven fellows who were subsequently
19 referred to Suskind, that there have been no long-term health
20 effects, adverse long-term health effects?

21 A Since I was not on the task force, I do not
22 know what the Company's position was on that. I'm aware
23 there were two studies, one done by a Dr. Suskind at the
24 University of Cincinnati, to look at worker health since the
25 accident in 1949. The task force, though, was working with

1 news release at the trade magazines and the plant cities
2 where, perhaps, that new product was going to be made if it
3 would add to employment. We would not direct that at the
4 national press. If we had -- I've given you the example of
5 an executive being moved. Certain media are only interested
6 if it's a vice-president level or above. Other people care
7 if it's any promotion. Usually an emergency type of news
8 release is going to get broad dissemination because the wire
9 services are going to be on the scene covering an emergency
10 event.

11 Q You have any other examples you can think of?

12 A Product publicity, emergencies and executive
13 promotions would be the bulk of the work in public relations
14 function.

15 Q So, generally, anything of interest -- for
16 example, in Exhibit 160, if you'll look at that, this deals
17 -- this is a document dated February the 9th written by
18 J. R. Condray to Mr. G. Young, and you received a copy of
19 it, right?

20 A That's correct. Mr. Young worked for me at
21 the time.

22 Q Okay. And this particular document deals
23 with a hearing of the Air Pollution Control Commission of
24 West Virginia, right?

25 A Yes.

1 the plant and Dr. Suskind, I guess, as well as Dr. Selikoff.
2 Have I answered your question?

3 Q Well, let me put it a little clearer. Is it
4 your position you don't know what other than reading this
5 so-called press release, these two versions of it, you have
6 no actual knowledge of what the Company's position was or is,
7 is that right?

8 A These both state "draft" on it. I think
9 you ought to ask Mr. Bishop if he issued that news release,
10 and he would be the best person to ask about what the
11 Company policy is. I was not on the task force.

12 Q You were not on it, you just received a
13 copy of it, right?

14 A That's correct.

15 Q On all these documents, 160 through 169,
16 let me just ask you some general questions. You do not
17 recall going to any meetings, is that correct, concerning
18 these documents?

19 A When somebody prepares a document, there's
20 usually not one person you can go to in the Company to get
21 answers, so you get opinions from various parts of the
22 Company, you put together either a position statement or
23 you try to anticipate typical questions you would receive
24 from the press, and that's in the format of question-and-
25 answer sheets and then you try to get the best possible

1 opinions of people. And as a courtesy when somebody prepares
2 a news release that deals with one of my plants, they would
3 expect me to review and give an affirmative to go ahead with
4 either question and answer or a news release or a position
5 statement dealing with my plant. So I would be involved in
6 discussions by telephone or stopping in people's offices to
7 review some of the documents in here.

8 Q You recall ever talking to anybody about
9 these documents, 160 through 169?

10 A Yes, I do. I would have worked with Dan
11 Bishop who was in the corporate department who prepared the
12 questions and answers and draft new releases and I would
13 have discussed those with him.

14 Q Would you have discussed, then, Plaintiff's
15 Exhibit 161?

16 A To the best of my recollection, I probably
17 would have discussed those two drafts.

18 Q Then would you have had any input into the
19 two sentences that we previously referred to?

20 A I do not recall making any input into those
21 two sentences.

22 Q I guess primarily because you don't have
23 any knowledge, firsthand knowledge, that you can give him
24 on that?

25 A That's correct.

1 Q That would have to come probably from, what,
2 the Department of Medical and Environmental Health?

3 A I would think that and the plant manager
4 and his staff.

5 Q I see. Like, Dr. Roush is shown as copied
6 on Plaintiff's Exhibit 161. He's in the Medical Department
7 of your company, right?

8 A He is.

9 Q And you have no idea what type of dissemina-
10 tion or what the dissemination would be of Plaintiff's
11 Exhibit 161, right?

12 A I do not.

13 Q Bishop would be the guy to ask on that,
14 right?

15 A Yes.

16 Q Look at Document 164, sir. This is a
17 document, apparently, authored by James E. McKee, dated
18 May 1st, 1979. It's to Messrs. Nolan and Throdahl, and
19 you received a copy of that, isn't that correct?

20 A That's correct.

21 Q And on paragraph three of page one, would
22 you read that to the Jury, sir?

23 A Paragraph three, "establish a task force to
24 be supervised by Messrs. Bishop and McCarville, which would
25 include the following people: Pierre Wilkins; Royce Scott,

1 Nitro Plant Manager; H. Max Galloway, Nitro Environmental
2 Manager; and a physician nominated by Dr. Roush. Assign
3 Susan Kelly of the Corporate Public Relations group to work
4 with Mr. Wilkins. The entire task force would work in
5 close liaison with Messrs. Holzapfel, Stohr and Isham."

6 Q And other than receiving documents and
7 talking to people, what type of liaison work did you do
8 with them?

9 A Well, while the task force was formed and
10 working on these issues, I was responsible for all public
11 relations dealing with the Nitro Plant.

12 Q And would that include the dioxin question
13 involved in the 2,4,5 T manufacturing units from '48
14 through '69?

15 A It would not. That would have been dele-
16 gated by me from my normal responsibilities to the task
17 force.

18 Q Okay. In other words, you did not get
19 involved in the formation of position papers to refute what
20 they thought Selikoff was going to say or anything like that,
21 right?

22 A That's correct, except as a review procedure
23 because it was my plant.

24 Q Do you know why Suskind's study, which the
25 examinations were done in June of '79, has not come out as

1 of yet?

2 A It's my recollection that Dr. Suskind
3 reviewed his findings with us but has not published them
4 because he has a large number of papers and he travels
5 throughout the world. He is a very busy man. I thought
6 that his final study had been brought out and was subject
7 to peer review. Is that not so?

8 Q I don't know. You have any information?

9 A I thought that it was published somewhere
10 and had been subject to peer review, but I'm not sure.

11 Q Are you talking about the morbidity study
12 or are you talking about the mortality study?

13 A Dr. Suskind was hired to study this group
14 on both mortality and morbidity basis because he had done
15 some initial studies after an industrial accident in '49
16 at the Nitro Plant, so he had knowledge of what went on then.

17 Q Okay. Would you be referring to the
18 Suskind and Zack Mortality Study which appears in the
19 Journal of Occupational Medicine in January of 1980?

20 A I'm not familiar with the publishing of
21 this study.

22 Q Then Exhibit 167 which you're cc'd on on
23 page eight, which has a document on that page which is a
24 memo, apparently, from Dan Bishop --

25 A Excuse me, Mr. Pratt. Apparently,

1 Document 167 consists of two separate memos, one dated
2 July 13th, 1979.

3 Q And you're not shown on that?

4 A I'm not shown on that. There is a second
5 part to it.

6 Q Page eight you're shown on.

7 A With a date almost a month later.

8 Q And you received a copy of that?

9 A I did.

10 Q And this was a preparedness study, re
11 Selikoff, Mount Sinai, right?

12 A Yes.

13 Q And on page nine is a document to counter
14 Selikoff's review, is it not, or report?

15 A A preparedness statement would be to anti-
16 cipate the likely questions of press and so to put together
17 Monsanto's position from various places around the corpora-
18 tion. As I indicated before, there is no one person who
19 has in-depth knowledge of a situation and you have to talk
20 to different people that have to amalgamate those thoughts
21 into one statement. So this is a preparedness statement
22 based on what we would anticipate would be questions of the
23 press.

24 Q Well, on page nine of 167, again, we find
25 the statement, "First in regard to dioxin effects, a recent

1 analysis of mortality rates of 121 employees exposed to
2 dioxin and accidental release of that material in 1949
3 indicates there is no statistical variance between the
4 mortality rates of the plant workers and the American public
5 as a whole." I guess they are referring to the mortality
6 study of Suskind and Zack, isn't that correct?

7 A The best of my recollection, that's based
8 upon the findings of Dr. Suskind.

9 Q As to the authenticity of that study, you
10 have no actual knowledge yourself, right, sir?

11 A It's an accurate study that was done by an
12 independent physician. I believe it.

13 Q Well, you didn't look at the raw data, that's
14 what I'm getting at.

15 A That's correct.

16 MR. PRATT: Okay. That's all.

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22 Robert C. Isham
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1
2 STATE OF ILLINOIS)
3 COUNTY OF MADISON) SS

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6
7 I, M. JOY SPRINGER, a Notary Public, duly
8 commission and qualified in and for the County of Madison,
9 State of Illinois, do hereby certify that pursuant to notice
10 came before me on the 30th day of June, 1983, at the
11 Radisson Hotel, Room 215, 9th Street and Convention Plaza,
12 St. Louis, Missouri, ROBERT C. ISHAM, who was by me duly
13 sworn to testify to the truth and nothing but the truth of
14 his knowledge touching and concerning the matters in contro-
15 versy in this case; that he was thereupon carefully examined
16 upon oath, and his examination reduced to writing under my
17 supervision; that the deposition is a true record of the
18 testimony given by the witness; and signature of the wit-
19 ness was not waived by agreement of counsel.

20 I FURTHER CERTIFY that I am neither attorney
21 nor counsel for nor related to nor employed by any of the
22 parties to the action in which this deposition is taken;
23 and further, that I am not a relative or employee of any
24 attorney and counsel employed by the parties hereto, or
25 financially interested in the action.

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IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal on this _____ day of
_____, 1983.

Notary Public within and
for the County of Madison,
in the State of Illinois.