

FILE NAME: National Safety Council (NSC)

DATE: 1984 Mar 30

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DOCUMENT DESCRIPTION: Legal - Notice to Take Deposition

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT HUNTINGTON

FILED

APR 03 1981

BLATT & FALEO

EMALENE M. STONE, EXECUTRIX OF THE
ESTATE OF ACIE K. STONE, DECEASED,

Plaintiff,

vs.

CIVIL ACTION NO. 81-3159

JOHNS-MANVILLE SALES CORPORATION,
A Delaware corporation, et al.,

Defendants.

NOTICE TO TAKE DEPOSITION

TO: ALL DEFENDANTS AND THEIR COUNSEL OF RECORD

NOTICE TO TAKE DEPOSITION

You are hereby notified that, pursuant to the terms and provisions of Rule 30 of the Federal Rules of Civil Procedure, on April 17, 1984, beginning at 10:00 a.m. at the Hotel Continental, 505 North Michigan Avenue, Chicago, Illinois, the plaintiff will take the deposition of Phillip Schmidt, Chief Librarian, National Safety Council, 444 N. Michigan Avenue, Chicago, Illinois.

This deposition is being taken in a number of jurisdictions as shown on the attached sheet. It is being taken pursuant to the Federal Rules of Civil Procedure for all purposes allowed by those rules, including use at trial. In cases which this deposition is noticed that are pending in State Courts or a Federal Court with special rules, this deposition will be conducted pursuant to those rules if not inconsistent with the Federal rules. If, for any reason, the deposition cannot be taken in compliance with all rules, a second deposition will be taken specifically for that Court at the same time and place listed above.

The purpose of this deposition is to have Mr. Schmidt produce annals of the National Safety Council and other publications present in the National Safety Council library and to authenticate the same materials. The Plaintiff further intends to inquire of the witness any knowledge he has concerning the membership of the National Safety Council. To the knowledge of the undersigned, Mr. Schmidt has never been deposed in asbestos litigation.

This deposition is expected to last only four hours but will continue from day to day until completed. You are invited to attend and participate.

Respectfully submitted,

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3/3c, 1984.

NOTICE OF DEPOSITION OF PHILLIP SCHMIDT SERVED IN THE FOLLOWING JURISDICTIONS

In Re: Asbestos Cases (USDC - South Carolina) (Insulator, Shipworker, Plantworker

USDC, District of Pennsylvania

Lechner v. Conrail, et al

C/A No. 82-2301, et al.

USDC, District of South Dakota, Southern Division

Burger v. Chicago Northwestern Transportation Co.

C/A No. 83-4118

USDC, Western District of Kentucky, Louisville Division

Greenwell v. Seaboard Systems Railroad, Inc.

C/A No. 83-0541-L-A

USDC, Eastern District of Tennessee

Brown v. Southern Railway Company

C/A No. 1-83-280

USDC, District of Utah, Central Division

Tea v. Denver & Rio Grande Western Railroad Co.

C/A No. C82-1174(C)

USDC, District of Nebraska

Carroll v. Union Pacific Railroad Co.

C/A No. 83-0-615

USDC, Southern District of West Virginia at Huntington

Judd v. The Chesapeake & Ohio Railway Co.

C/A No. 83-3035

USDC, Eastern District of Pennsylvania

Scholl v. Conrail and The Reading Co.

C/A No. 82-1685

Circuit Court, Twentieth Judicial Circuit, St. Clair County, Illinois

Pease v. Illinois Central Gulf Railroad Co.

C/A No. 82-L-1012

USDC, Western District of Virginia, Roanoke Division

Palmer v. Norfolk & Western Railway Co.

C/A No. 83-0282-R

USDC, District of Maryland

Davis v. Western Maryland Railway Co., et al.

C/A No. N-83-4

USDC, District of Maryland

Yergan v. The Baltimore & Ohio Railroad Co.

C/A No. H-83-1231

USDC, Middle District of Florida, Jacksonville Division

Grimsley v. Seaboard System Railroad, Inc.

C/A No. 83-880-Civ-J-12

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of March, 1984, he served the attached document on the defendants, by mailing a true copy thereof, postage prepaid, in the United States Mails, to all Defense Attorneys of Record as follows:

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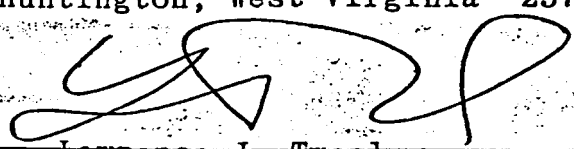
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