

IN RE: ALL ASBESTOS-RELATED PERSONAL
INJURY OR DEATH CASES FILED BY
OR TO BE FILED BY BARON & BUDD, P.C.
IN NUECES COUNTY, TEXAS

DEFENDANT KOCH PETROLEUM GROUP, L.P.'S
AMENDED NOTICE OF INTENTION TO TAKE ORAL DEPOSITION

TO: Plaintiffs, by and through their counsel of record, Stephanie Finch, Baron & Budd, 3102 Oak
Lawn Avenue, #1100, Dallas, TX 75219.

PLEASE TAKE NOTICE that the deposition of the person named below will be taken at the
time and place designated in this notice by the attorney for the Defendant.

WITNESS: J. L. LAIRD

DATE: WEDNESDAY, OCTOBER 3, 2001

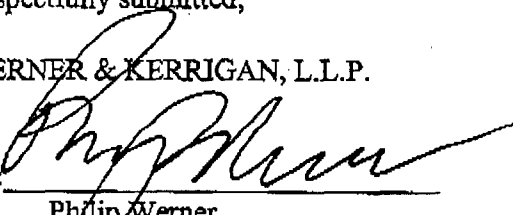
TIME: 10:00 A.M.

PLACE: OFFICES OF BRACEWELL & PATTERSON
106 S. St. Mary's, Suite 800
San Antonio, Texas 78405
(210) 226-1166

Mr. Laird is a former employee of Sun and Koch who has knowledge of refinery operations in
Corpus Christi.

Respectfully submitted,

WERNER & KERRIGAN, L.L.P.

By: 

Philip Werner

State Bar No. 21190200

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Houston, Texas 77056

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ATTORNEYS FOR DEFENDANT,
KOCH PETROLEUM GROUP, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all known counsel of record pursuant to the Texas Rules of Civil Procedure on this the 20~~2~~ day of September, 2001.

A handwritten signature in black ink, appearing to read "Philip Werner", written over a horizontal line.

Philip Werner