

2 1 2 3 4 5 6 August 2, 2002 7 9:26 a.m. 8 9 Deposition of IAN C. SAYERS, held at the 10 offices of Orrick, Herrington & Sutcliffe, 11 666 Fifth Avenue, New York, New York, 12 pursuant to notice, before Laurie A. 13 Collins, a Registered Professional Reporter 14 and Notary Public of the State of New York. 15 16 17 18 19 20 21 22 23 24 25	4 1 2 APPEARANCES (continued): 3 4 FOLEY & LARDNER 5 Attorneys for Union Carbide 6 and Witness 7 777 East Wisconsin Avenue 8 Suite 3800 9 Milwaukee, Wisconsin 53202-5367 10 BY: TREVOR J. WILL, ESQ. 11 12 ORRICK, HERRINGTON & SUTCLIFFE LLP 13 Attorneys for Union Carbide 14 and Witness 15 666 Fifth Avenue 16 New York, New York 10103-0001 17 BY: PETER A. BICKS, ESQ. 18 19 BAKER BOTTS LLP 20 Attorneys for Union Carbide 21 One Shell Plaza 22 910 Louisiana Street 23 Houston, Texas 77002-4995 24 BY: GEORGE T. SHIPLEY, ESQ. 25
3 1 2 APPEARANCES: 3 4 SIEBEN POLK LaVERDIERE JONES & HAWN 5 Attorneys for Minnesota Personal 6 Injury Plaintiffs 7 999 Westview Drive 8 Hastings, Minnesota 55033-2495 9 BY: MICHAEL S. POLK, ESQ. 10 11 BROWNSON & BALLOU 12 Attorneys for Conwed Corporation 13 225 South Sixth Street 14 Suite 4800 15 Minneapolis, Minnesota 55402 16 BY: ROBERT D. BROWNSON, ESQ. 17 18 PIPER RUDNICK 19 Attorneys for Conwed Corporation 20 203 N. LaSalle Street 21 Suite 1800 22 Chicago, Illinois 60601-1293 23 BY: MICHAEL R. GOLDMAN, ESQ. 24 25	5 1 2 APPEARANCES (continued): 3 4 THE LANIER LAW FIRM, P.C. 5 Attorneys for Kelly-Moore 6 in Allphin v. ACANDS case 7 P.O. Box 691448 8 Houston, Texas 77269-1448 9 BY: W. MARK LANIER, ESQ. 10 DARA GRISBEE HEGAR, ESQ. 11 12 ALSO PRESENT: 13 ARNOLD R. LEVINSON, ESQ. 14 KEVIN PARKER, ESQ. 15 DAVID EGILMAN 16 WILL LANIER 17 LULANNE JACOBS, Legal Assistant 18 JORGE MUNOZ, Videographer 19 GARY DELGADO, Videographer 20 21 22 23 24 25