

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CIV. No. 1:19-cv-01334-CJB

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MIDWEST ENERGY EMISSIONS CORP.
and MES INC.,

Plaintiffs,

-against-

ARTHUR J. GALLAGHER & CO., et al.,

Defendants.

-----x

August 24, 2022
8:56 a.m. CST

- [REDACTED] -

- [REDACTED] [REDACTED] R-

VIDEOTAPED ZOOM DEPOSITION of
MICHAEL HOLMES, the Witness in the
above-entitled action, held via Zoom
videoconference, taken before Dawn
Matera, a Certified Shorthand Reporter
and Notary Public of the State of New
York.

* * *

Page 2 1 APPEARANCES : 2 3 CALDWELL CASSADY & CURRY, P.C. 4 Attorneys for Plaintiffs 5 2121 N. Pearl Street 6 Suite 1200 7 Dallas, Texas 75201 8 By: JUSTIN NEMUNAITIS, ESQ. 9 jnemunaitis@caldwellcc.com 10 ADRIENNE DELLINGER, ESQ. 11 adellinger@caldwellcc.com 12 13 GIBSON DUNN & CRUTCHER, LLP 14 Attorneys for Defendants 15 1801 California Street 16 Suite 4200 17 Denver, Colorado 80202 18 19 By: DAVID GLANDORF, ESQ. 20 dglendorf@gibsondunn.com 21 JOSEPH EVALL, esq. 22 jevall@gibsondunn.com 23 200 Park Avenue 24 New York, New York 10166-0193 25 16 BRADLEY ARANT BOULT CUMMINGS, LLP 17 Attorneys for CERT Defendants 18 1819 5th Ave North 19 One Federal Place 20 Suite 200 21 Birmingham, Alabama 35203 22 By: PAUL SYKES, ESQ. 23 psykes@bradley.com 24 BEN C. WILSON, ESQ. 25 bwilson@bradley.com	Page 4 1 THE VIDEOGRAPHER: We are going 2 on the record at 8:56 a.m. Central 3 Time on August 24th, 2022. This is 4 media unit number 1 of the 5 video-recorded deposition of Michael 6 v. Holmes taken in the matter of 7 Midwest Energy Emissions Corporation 8 and MES Incorporated v. Arthur J. 9 Gallagher, et al., in the U.S. 10 District Court for the District of 11 Delaware, case number 12 1:19-CV-01334-CJB. 13 The location of this deposition 14 is Grand Fork, North Dakota. This is 15 Kraig Hildahl from Veritext Legal 16 Solutions, I am the videographer. The 17 court reporter today is Dawn Matera, 18 also of Veritext. 19 Will counsel please introduce 20 themselves for the record. 21 MR. NEMUNAITIS: Justin 22 Nemunaitis for the plaintiffs and the 23 witness. 24 MR. GLANDORF: David Glandorf of 25 Gibson Dunn for the defendants, and
Page 3 1 APPEARANCES : (Continued) 2 3 Also Present: 4 5 KRAIG HILDAHL, Videographer 6 7 CHELSEA GILCHRIST, Concierge 8 9 INA KOSOVA, Law Clerk, Gibson Dunn 10 ~oOo~ 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 5 1 with me is Joseph Evall of Gibson 2 Dunn. 3 MR. SYKES: Paul Sykes for the 4 CERT defendants. 5 MICHAEL HOLMES, the Witness 6 herein, having first been duly sworn by 7 the Notary Public, was examined and 8 testified as follows: 9 EXAMINATION BY 10 MR. GLANDORF: 11 Q. Good morning, Mr. Holmes. 12 A. Good morning. 13 Q. If you would just take a moment 14 and -- I know we already have done this, 15 but if you take a moment and state and 16 spell your name for the record? 17 A. My full name, sir? 18 Q. Yes. 19 A. Okay. My full name is Michael 20 Jerome Holmes, it's M-I-C-H-A-E-L, and 21 Jerome is spelled J-E-R-O-M-E, and Holmes 22 is H-O-L-M-E-S. 23 Q. What is your address, 24 Mr. Holmes? 25 A. My address is 2144S for south,

2 (Pages 2 - 5)

Page 6 1 38th Street, Grand Forks, North Dakota 2 58201. 3 Q. Have you ever been deposed 4 before? 5 A. Yes. 6 Q. How many times? 7 A. One. 8 Q. And was that deposition in 9 relation to mercury control technology? 10 A. No, sir. 11 Q. Was that deposition in your 12 professional capacity? 13 A. Yes. 14 Q. What was the issue, what was at 15 issue in that deposition? 16 A. So the issue, the way I 17 understood it, was I did atomizer 18 evaluations early in my career. And one 19 of the atomizers that I did particle size 20 measurements, velocity, that type of 21 thing. We had to evaluate. There was a, 22 a customer was being, I guess, accused of 23 over -- my understanding is they were 24 being accused of overselling the 25 capabilities and making and utilizing	Page 8 1 A. Yes. 2 Q. Even though we are being 3 videoed, the court reporter is recording 4 only words, so it's important that you 5 answer in words rather than gestures or 6 nods; do you understand that? 7 A. Yes. 8 Q. And it's a little awkward over 9 Zoom, but I will do my best to let you 10 finish answering a question and I ask 11 that you let me finish asking before you 12 provide your answer; is that okay? 13 A. Yes. 14 Q. If at any time you do not 15 understand a question, please ask and I 16 will do my best to clarify. Do you 17 understand that? 18 A. Yes, thank you. 19 MR. NEMUNAITIS: David, can I 20 interrupt for one second and just ask 21 you, can everybody hear everything 22 okay still? 23 THE REPORTER: I can. 24 MR. GLANDORF: I can. 25 (Off the record.)
Page 7 1 part of the report that I had created. 2 So a lot of the questions related to 3 performance of the atomizer. 4 Q. Roughly when was that 5 deposition? 6 A. Oh, wow, roughly 1990, plus or 7 minus a couple of years. 8 Q. Fair enough. So it's been a 9 little while. I am going to take a few 10 moments, if it's okay, and just outline 11 some of kind of the ground rules and the 12 expectations here. 13 So you are under oath. You are 14 under oath? 15 A. Yes. 16 Q. I will be asking you questions 17 today and you are obligated to provide 18 true and accurate and complete answers to 19 the best of your ability; do you 20 understand that? 21 A. Yes. 22 Q. The court reporter will record 23 my questions and your answers and the 24 videographer will be recording you. Do 25 you understand that?	Page 9 1 BY MR. GLANDORF: 2 Q. We will take periodic breaks, 3 please let me know if you need a break at 4 any time. I would just ask that you 5 would finish answering any pending 6 question; is that okay? 7 A. Yes. 8 Q. Are you planning to offer 9 testimony at trial in this matter? 10 A. No. 11 Q. Are you being compensated for 12 this deposition? 13 A. No. 14 MR. GLANDORF: So at this time I 15 am going to introduce our first 16 exhibit, we will see how this goes. 17 (Holmes Exhibit 1, Document 18 Bates stamped ME2C-RC-00163545, was so 19 marked for identification, as of this 20 date.) 21 A. Is it going to come up on my 22 screen or do I need to pull something up? 23 Q. I believe it will come up. But 24 it's still thinking about it here. 25 (Off the record.)

3 (Pages 6 - 9)

Page 10 1 BY MR. GLANDORF: 2 A. Okay, my resumé came up. 3 Q. Excellent. All right. This is 4 going to work. 5 Mr. Holmes, do you see Exhibit 6 1? 7 A. Yes, I see the resumé. It says 8 Exhibit 1, I see that. 9 Q. And are you able to scroll 10 around and see the whole document? 11 A. Let me try here. Yes. 12 Q. Do you recognize Exhibit 1? 13 A. Yes. 14 Q. What is Exhibit 1? 15 A. It's my -- you were looking for 16 a long resumé, so it was my resumé before 17 I left EERC to take on my new job, so in 18 my new job I don't have a long resumé. 19 So I provided this. 20 Q. Who prepared this document? 21 A. I think executive assistant. 22 Administrative assistant. 23 Q. An administrative assistant at 24 EERC? 25 A. Yes.	Page 12 1 of time walking through your employment 2 and educational background, if we could. 3 A. Yes. 4 Q. Could you start by telling us 5 your -- where you went to college and 6 what you studied? 7 A. Yes. I started my college at a 8 college in North Dakota called Mayville, 9 M-A-Y-V-I-L-L-E, State University. And I 10 got two bachelor's degrees at Mayville 11 State, one in chemistry, and one in 12 mathematics. And as part of that, I 13 decided engineering was the route for me 14 because I liked the more math-driven 15 chemistry. 16 So I ended up getting a Master 17 of Science degree in chemical engineering 18 at the University of North Dakota. And 19 so that was roughly a two-year to finish 20 all the course work. 21 And then I later defended my 22 thesis and I can't remember the exact 23 year I went and defended my thesis. But 24 I was employed as of September, I guess 25 it was August of 1986.
Page 11 1 Q. And what does EERC stand for? 2 A. Energy and Environmental 3 Research Center. 4 Q. Are you currently employed at 5 EERC? 6 A. No. 7 Q. Where is your current place of 8 employment? 9 A. I work kind of a hybrid job 10 where I work under a North Dakota 11 industrial commission as a technical 12 advisor. And then I work under the 13 Lignite Energy Council as the executive 14 vice president for R&D. My focus is on 15 lignite coal and it's focused on the 16 State's R&D program. And I believe 17 there, I believe it was December of 2016. 18 Q. So is this resumé updated as of 19 December of 2016? 20 A. Yeah. So it would be the 21 resumé I would use before I left and 22 officially and basically through the 23 calendar year 2016. 24 Q. Let's step back now to the 25 beginning. I want to spend a little bit	Page 13 1 Q. And at a high level -- sorry to 2 interrupt. At a high level, what was 3 your thesis, what was the subject of your 4 thesis? 5 A. Oh, my thesis subject was on 6 basically, it was related to coal 7 liquefaction. And there are two types of 8 coal liquefaction. Mine was focused on 9 direct liquefaction. 10 Q. Can you define liquefaction for 11 us? 12 A. Yes, turning coal into a liquid 13 fuel, primarily fuel. 14 Q. Where did you go after 15 graduating? 16 A. After graduating I took a job 17 at Babcock & Wilcox's research and 18 development division in Alliance, Ohio. 19 Q. And how long were you there? 20 A. 15 years. 21 Q. And what was your position 22 while you were -- I assume it changed 23 over time? 24 A. Yeah, it changed over time. I 25 believe when I left it was titled

4 (Pages 10 - 13)

Page 14 1 principal engineer 2. It might have been 2 principal research engineer 2. But it 3 was a nondescript title, you know. 4 They had a bunch of researchers 5 working together on projects. So I would 6 manage different projects. 7 Q. You were managing research 8 projects; is that right? 9 A. Yes. 10 Q. All related to coal combustion? 11 A. No. No. R&D related to 12 energy. So coal combustion was certainly 13 in the mix. 14 I did -- stop me if I am going 15 off track -- but I did particle size 16 measurements. Gas velocity using laser 17 technologies like laser Doppler 18 velocimetry, Malvern particle sizing. 19 Atomizers. I did a lot of work on SO2 20 emissions from different facilities. 21 Fuel processing. Some for the fuel cell 22 industry to prepare and process fuels to 23 provide hydrogen mixtures for fuel cells. 24 And economic evaluations. 25 I'll stop there and wait for a	Page 16 1 trying to measure and capture one part 2 per billion. 3 I guess I will wait for a more 4 specific question, but I will say that a 5 lion's share of that project was focused 6 on wet scrubbers. Because Babcock & 7 Wilcox, at the time, a lot of their 8 business was in wet scrubbers. 9 Q. Okay. We will come back to 10 those, I believe, as we go along here. 11 At some point then you 12 transitioned to EERC; is that correct? 13 A. Yes. 14 Q. And why did you make that 15 change? 16 A. Family health reasons from 17 North Dakota and Minnesota made me want 18 to look at moving back closer to be near 19 specifically my mother. 20 Q. And what position were you 21 hired to at EERC? 22 A. I can't remember the initial 23 title. I think it was -- sorry, it was a 24 long time ago. It was August of 2001. 25 And my title was senior research advisor,
Page 15 1 more direct question, because I could use 2 up all your time talking about the 3 various projects. 4 Q. Fair enough. Let me ask a 5 couple of more targeted questions. 6 Was a portion of your work 7 during this time related to mercury 8 control from emissions? 9 A. Yes. 10 Q. And was your work tied to any 11 particular location, any particular 12 energy plants or systems? 13 A. My work, the biggest and last 14 project I did was tied to, it had partial 15 funding from the Ohio Coal Development 16 office. And also we had a suite of fuel 17 that happened to be representative of a 18 subbituminous coal. 19 Q. Can you give us a description 20 of the type of work you did related to 21 mercury during that time? 22 A. There was a lot of variety in 23 that project. But it was everything from 24 which analyzers worked and how and when 25 they work. Because with mercury, you're	Page 17 1 I am pretty sure. And I apologize, I 2 never really focused heavily on title. 3 Q. That's fair. Was your work 4 during your time at EERC in this 2001 to 5 2004 time period -- let me start again. 6 During the 2001 to 2004 time 7 period at EERC, was your work focused on 8 mercury control? 9 A. In R&D, your work ends up being 10 diverse because you got a lot of 11 opportunity, a lot of challenges facing 12 the industry and a lot of contracts. But 13 it is fair to say a majority of my work 14 at that time was focused on mercury. 15 Q. During that time, was the focus 16 still on wet scrubbers or were there dry 17 scrubbing techniques as well? 18 A. The focus during that time was 19 more diverse than wet scrubbers. And wet 20 scrubbers were a very, I guess I am 21 remembering a very small portion of what 22 I was focused on. It was some, but it 23 wasn't the main focus. 24 Q. What was the main focus? 25 A. Well, the main focus was -- let

5 (Pages 14 - 17)

Page 38	Page 40
1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]	1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]
Page 39	Page 41
1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]	1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 Q. Prior to implementation of the 6 regulations, was activated carbon the 7 most commonly studied sorbent for mercury 8 control? 9 A. Yes, I believe so. 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]

11 (Pages 38 - 41)

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18 [REDACTED]
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21 [REDACTED]
22 Q. For mercury control, where in
23 the system do you typically add activated
24 carbon?
25 A. I am trying to think how varied

Page 71

1 it is, but the simple answer is upstream
2 of the particulate capture system and I
3 guess I would work with an activated
4 carbon chemist.
5 And again, my problem with this
6 is I haven't done any of the commercial
7 work on this so I don't know where they
8 add it. But you would want to be
9 downstream enough not to destroy the
10 carbon properties. And upstream enough
11 to get that in-flight benefit as well as
12 any benefit in the particulate capture
13 system. So upstream of your particulate
14 collection. Downstream of any
15 detrimental temperatures.
16 Q. Thank you, that's helpful.
17 I am just trying to define a
18 range here. Because I understand that
19 there is some variety within that range
20 of location.
21 So just to clarify, you would
22 not want to add the activated carbon
23 after the particulate collection system,
24 because then you wouldn't be able to
25 remove those particulates; is that right?

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1 A. Well, I would have to talk to
2 power plants and make sure that I am not
3 wrong, but I would say that's right
4 unless you've got a second particulate
5 collection system, you're going to fail
6 your capacity requirements at the power
7 plant if you aren't upstream of your
8 particulate collection.
9 Q. And you want to be downstream
10 of any area where the temperatures are
11 high enough to destroy the carbon; is
12 that right?
13 A. That would be my belief, yeah.
14 Q. You would not want to inject an
15 activated carbon sorbent into the
16 combustion zone; is that fair?
17 A. I wouldn't.
18 Q. Let's introduce a new exhibit
19 here, if we can. It's going to be a pair
20 of exhibits. And so maybe --
21 A. Can I go back to that --
22 Q. Oh, sure.
23 A. -- question slightly?
24 I am not saying that someone
25 else hasn't found some magic way to

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1 activate a sorbent in the combustion
2 zone. I am just saying unrelated to my
3 knowledge of, you know, the patents or
4 anything else, it strikes me as an
5 engineer you wouldn't want to throw
6 something in a combustion zone that might
7 be destroyed. But I could see maybe some
8 sorbents being activated, possibly. I
9 don't know.
10 Q. You would expect a carbon-based
11 sorbent to combust in the combustion
12 zone; is that right?
13 A. If you're in with the coal and
14 it gets all of that mixing that the coal
15 gets, I would expect that it would be
16 reactive.
17 Now, activated carbon is a
18 little less reactive than coal, because
19 it's already been charred and steam
20 activated. But again, that's where I
21 think you would have a, get a better
22 answer than I can give from a carbon
23 chemist.
24 [REDACTED]
25 [REDACTED]

19 (Pages 70 - 73)

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12 [REDACTED]
13 Q. And who is that?
14 A. Sharon Sjostrom, from my memory
15 of her, worked for a company called ADA.
16 Q. Both of these individuals were
17 involved in the study of mercury control;
18 is that right?
19 A. I'm not sure of the level of
20 involvement of Kilgroe. He obviously was
21 at the conference. But Sharon I remember
22 working a lot with different projects.
23 Q. Were you more familiar with
24 Sharon Sjostrom than Kilgroe?
25 A. Yes. As far as what activity

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1 they did, yes. But not completely
2 familiar with anything either of them
3 did.
4 Q. In your experience with Sharon
5 Sjostrom, did you find her work to be of
6 good reputation?
7 A. I would primarily see the
8 results. I thought she was a researcher.
9 Q. I'm sorry, I didn't catch that
10 word, what was -- you thought she was?
11 A. I thought she was one of the, I
12 think you use the word "good reputation."
13 I had no reason to doubt her reputation
14 in the field.
15 [REDACTED]
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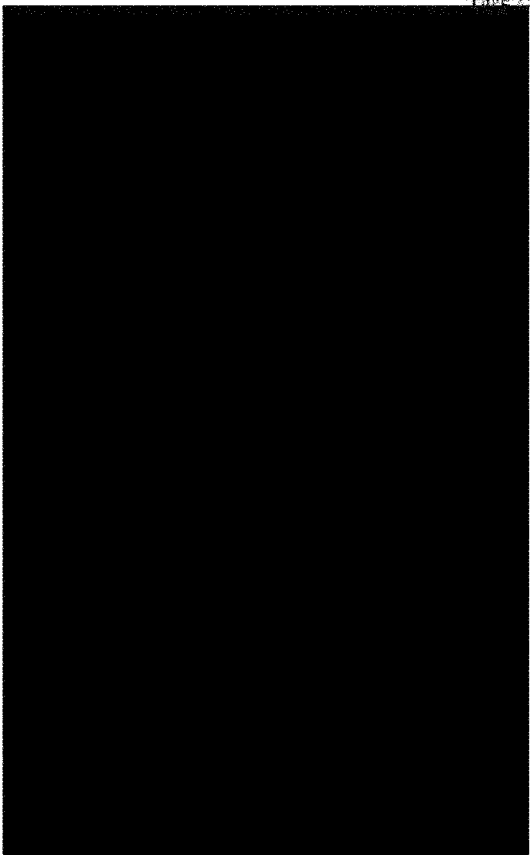
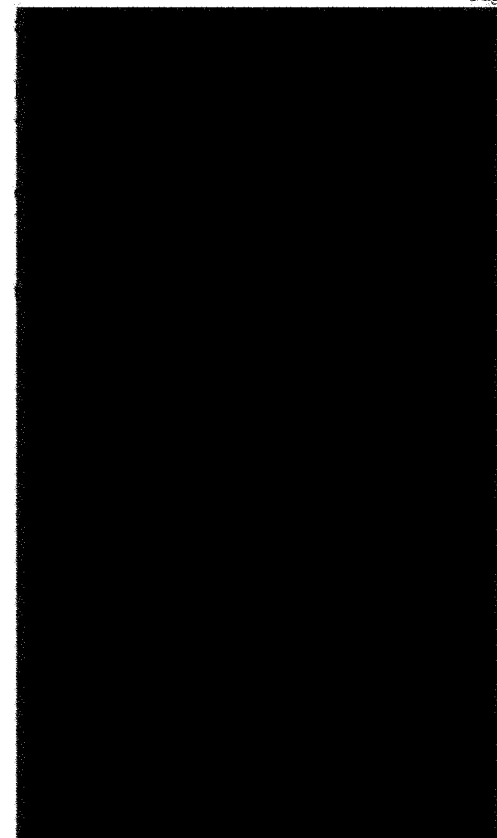
Do you have an understanding of the word "char"?

A. Though, in working with researchers over the decades, char is defined differently by some people that are in the same area as me, but, yeah, I

30 (Pages 114 - 117)

Page 118 1 understand what the definition of char to 2 be. 3 Q. I would ask you, if you could, 4 to give me the definition of char that 5 you feel is appropriate for the coal- 6 fired power plant context? 7 A. A quick answer is char is coal 8 or carbonous material that hasn't been 9 completely burnt. 10 Q. Do you have an understanding of 11 the term "pyrolysis"? 12 A. Yes, but again, pyrolysis is 13 one of those words, it's an extent of a 14 decomposition of a carbon fuel. So I 15 would have to look at the context to 16 where someone is talking about pyrolysis 17 to understand exactly what another person 18 means. 19 20 21 22 23 24 25	Page 120 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 119 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 121 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

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1		1 MR. NEMUNAITIS: Just to be
2		2 safe, yes, let's designate that under
3		3 the protective order for now and the
4		4 witness would also like to read and
5		5 sign.
6		6 THE VIDEOGRAPHER: We are going
7		7 off the record at 4:18 p.m.
8		8 (Time noted: 4:18 p.m.)
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	Page 231	Page 233
1		1 ACKNOWLEDGMENT OF DEPONENT
2		2
3		3 I have read the foregoing
4		4 transcript of my deposition and except
5		5 for any corrections or changes noted on
6		6 the errata sheet. I hereby subscribe to
7		7 the transcript, as an accurate record of
8		8 the statements made by me.
9		9
10		10
11		11
12		12 SUBSCRIBED AND SWORN before
13		13 and to me this _____ day of _____,
14		14 2022.
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1
2 CERTIFICATION
3
4 I, DAWN MATERA, a Notary Public for
5 and within the State of New York, do hereby
6 certify:
7 That the witness whose testimony as
8 herein set forth, was duly sworn by me; and
9 that the within transcript is a true record of
10 the testimony given by said witness.
11 I further certify that I am not
12 related to any of the parties to this action
13 by blood or marriage, and that I am in no way
14 interested in the outcome of this matter.
15 IN WITNESS WHEREOF, I have hereunto
16 set my hand this 25th day of August, 2022.
17
18 *Dawn Matera*
19 DAWN MATERA
20
21
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25

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14 Exhibit 7 Document Bates stamped 76
15 ME2C-RC-00119228
16 Exhibit 8 Document Bates stamped 76
17 ME2C-RC-00119229
18 Exhibit 11 Document Bates stamped 149
19 ME2C-RC-00070797
20 Exhibit 9 Document Bates stamped 161
21 ME2C-RE-00074927
22 Exhibit 10 Document Bates stamped 164
23 ME2C-RC-00070583
24
25 ~oOo~

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1 ERRATA SHEET
2 VERITEXT
3 CASE NAME: Midwest Energy Emissions Corp
4 v Arthur J. Gallagher & Co.
5 DATE OF DEPOSITION: August 24, 2022
6 WITNESS'S NAME: MICHAEL HOLMES
7 PAGE/LINE(s) CHANGE REASON
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19 MICHAEL HOLMES
20 Subscribed and Sworn To
21 Before Me This Day
22 of , 2022
23 Notary Public
24 My Commission Expires
25

60 (Pages 234 - 236)

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and
(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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