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Title	THE UNITED STATES OF AMERICA V. PHILIP MORRIS IN C., ET AL.
Organization Author	THOMPSON COBURN
Person Authors	CASSETTA,RP
Document Date	20000110 (January 10, 2000)
Document Type	LETT, LETTER ; LIST, LIST
Bates Number	82537821/7828
Collection	Lorillard
Pages	8
Organization Recipients	CIVIL DIVISION; TORTS BRANCH; US DEPT OF JUSTICE
Person Recipients	GLYNN,JP
Person Copied	GREEN,DH
Organizations Mentioned	CA; IRON WORKERS LOCAL 17; KINGS COUNTY LITIGATION; LEXINGTON INSURANCE; MD; MN; MS; NY; OH; PM, PHILIP MORRIS; US; WA
Persons Mentioned	ARCH,SR; BARNES,W; BELL,JH; BROIN,N; BUTLER,B; COGGINS,C; ENGLE,H; FROSINA,R; HOBERMAN,S; HOSKINS,MA; IRELAND,MS; JESSUP,H; JONES,ST; KELMAN,BJ; LINDSLEY,VD III; MINNEMEYER,HJ; NORMAN,V; ORCUTT,R; ORLOWSKY,M; PREDDY,A; REED,S; RICHARDSON,M; RUBIN,E; SCHICKEDANTZ,P; SCHULTZ,FJ; SPEARS,AW; SUDHOLT,M; TISCH,A; ZITO,C
Characteristics	ATCH, ATTACHMENTS MISSING
File Number	82537581/82537962/LITIGATION UNITED STATES V. PM ET AL. COURT PAPERS - VOLUME II; 82537582/82537961/LITIGATION UNITED STATES V. PHILIP MORRIS, ET AL. COURT PAPERS VOLUME II
Litigation Usage	FEDA/PRODUCED
Minnesota Request Number	R1-080
Area	LEGAL DEPT. FILE ROOM/CENTRAL FILES
Site	N14
Date Added UCSF	20020709 (July 9, 2002)
Date Added Industry	20011220 (December 20, 2001)
TID	nfj62d00

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VIA HAND-DELIVERY & FACSIMILE

J. Patrick Glynn, Esq.
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Torts Branch, Civil Division
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Washington, D.C. 205030-0001

RE: *The United States of America v. Philip Morris Inc., et al.*

Dear Patrick:

Enclosed please find the following attachments on behalf of Lorillard Tobacco Company ("Lorillard"), in accordance with paragraph 6 of the Second Case Management Order:

1. Pursuant to paragraph 6(b)(ii), a list of depositions taken of current or former employees of Lorillard, in cases described in paragraph 6(b)(i) of the Second Case Management Order, from January 1, 1990, until September 23, 1999 (the filing date of this action).

2. Also pursuant to paragraph 6(b)(ii), a list of depositions taken of experts proffered by Lorillard or by defendants jointly, in cases described in paragraph 6(b)(i) of the Second Case Management Order, from January 1, 1990, until September 23, 1999. Please note that where an expert deposition meets the listing requirements of paragraph 6(b)(ii), but is included on a separate list provided to you today by any other defendant in this action, Lorillard has not listed that deposition, irrespective of whether Lorillard was a defendant in the action where that expert was proffered and deposed.

3. Pursuant to paragraph 6(b)(iii), a listing of the liability policy that potentially covers claims against Lorillard related to smoking and health, in whole or in part.

The case list required by paragraph 6(b)(i) of the Second Case Management Order has been forwarded to you today under separate cover from other defense counsel.

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1. EMPLOYEE DEPOSITION LIST

DEPOSITIONS OF CURRENT OR FORMER LORILLARD TOBACCO COMPANY OFFICERS AND EMPLOYEES TAKEN 1/1/90 TO 9/23/99 IN CASES DESCRIBED IN PARAGRAPH 6.b.i OF THE SECOND CASE MANAGEMENT ORDER		
DEPONENT	CASE	DATE
Bell, Jimmy H.	Reed, Samuel Richardson, Mildred State of Maryland	19980819
Coggins, Christopher	State of Mississippi	19970325
Coggins, Christopher	Broin, Norma	19970522
Coggins, Christopher	Iron Workers Local 17 (OH)	19981110
Ireland, Mary Sue	Frosina, Rose Hoberman, Sharlene Hoskins, Mary Ann Zito, Catherine	19971023
Jessup, Hallie	State of Minnesota	19970410
Jessup, Hallie	State of Washington	19970411
Jones, Stephen T.	Reed, Samuel	19970421
Lindsley III, Victor D.	Arch, Steven R./Barnes, William	19970530
Lindsley III, Victor D.	State of Minnesota	19970925
Lindsley III, Victor D.	Barnes, William Commonwealth of Massachusetts State of California	19980608 19980609
Minnemeyer, Harry	Reed, Samuel Richardson, Mildred State of Maryland	19980521
Minnemeyer, Harry	State of California	19980522
Norman, Vello	State of California	19980527

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2. EXPERT DEPOSITION LIST

(Note: Where an expert deposition has been listed this day on the submission of another defendant, it has not been listed here.)

DEPOSITIONS OF EXPERTS PROFERRED BY LORILLARD TOBACCO COMPANY OR DEFENDANTS JOINTLY, TAKEN 1/1/90 TO 9/23/99 IN CASES DESCRIBED IN PARAGRAPH 6.b.i OF THE SECOND CASE MANAGEMENT ORDER		
DEPONENT	CASE	DATE
Coggins, Christopher	Broin, Norma	19970522
Jones, Stephen T.	Reed, Samuel	19970421
Kelman, Bruce J.	Engle, Howard	19990910
Jones, Stephen T.	Reed, Samuel	19970717
Rubin, Emmanuel	Barnes, William	19971009
Spears, Alexander W.	Broin, Norma Engle, Howard	19940426
Spears, Alexander W.	Broin, Norma Engle, Howard	19970415
Spears, Alexander W.	Barnes, William Frosina, Rose Hoberman, Sharlene Hoskins, Mary Ann Small, Phyllis State of Texas Zito, Catherine	19970724
Spears, Alexander W.	State of Minnesota	19970923
Spears, Alexander W.	State of Washington	19980624
Spears, Alexander W.	Butler, Burl (wrongful death)	19990305
Spears, Alexander W.	Kings County litigation (NY)	19990616

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