

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

100-25
RECEIVED

OCT 26 1981

JAMES F. DAVEY, Clerk

FRIENDS FOR ALL CHILDREN, INC., as
legal guardian and next friend of
the named 150 infant individuals,
et al.,

Plaintiff,

-against-

Civil Action No.
76-0544

LOCKHEED AIRCRAFT CORPORATION,

Defendant and
Third-Party Plaintiff,

-against-

THE UNITED STATES OF AMERICA,

Third-Party Defendant.

DEFENDANT LOCKHEED AIRCRAFT CORPORATION'S
NOTICE TO TAKE ORAL DEPOSITIONS

TO: OREN R. LEWIS, ESQ.
LEWIS, WILSON, LEWIS & JONES
2054 NORTH 14TH STREET
ARLINGTON, VA 22216

SIR:

PLEASE TAKE NOTICE that pursuant to Rule 30 of the
Federal Rules of Civil Procedure, the deposition upon oral
examination of the following individuals will be taken on
behalf of defendant Lockheed Aircraft Corporation by its
attorneys Haight, Gardner, Poor & Havens at its offices at
1819 H Street, N.W., Suite 1000, Washington, D.C. at the times
and dates indicated, to continue from day to day until
completed:

Stanley Morain	10:00 a.m.	October 26, 1981
Charles Turner	10:00 a.m.	October 27, 1981
John J. Carroll	10:00 a.m.	October 27, 1981
Alvin Hyde	10:00 a.m.	October 27, 1981

DEFT. EX. ~~DD~~ #1

DATE: 10/31/81 - Turner

REPORTER: ALBERT J. GASDOR

Emanuel Tanay	10:00 a.m.	October 27, 1981
Burton Sokoloff	10:00 a.m.	October 27, 1981
Bruce Copeland	10:00 a.m.	October 27, 1981
Marianne Schuelein	10:00 a.m.	October 27, 1981
Eric Denhoff	10:00 a.m.	October 27, 1981
Robert Cromack	10:00 a.m.	October 27, 1981
Kenneth Mason	10:00 a.m.	October 27, 1981
Douglas Busby	10:00 a.m.	October 27, 1981

Such depositions will be taken upon oral examination for the purposes of discovery or as evidence or both, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, before an officer authorized by law to administer oaths.

PLEASE FURTHER TAKE NOTICE that pursuant to Rule 34 of the Federal Rules of Civil Procedure, the plaintiffs and the deponents are hereby requested to produce at the above deposition all documents in the possession, custody or control of the deponents, plaintiffs or their attorneys pertaining or relating to the medical or psychological condition of the above-named plaintiff or the cause of said condition, including but not limited to: any documents concerning aerospace medicine or related fields, reports concerning the C-5A, materials relating to trauma, materials relating to "survivor guilt syndrome" or massive psychic trauma, G-forces or other forces, geographic, topographic or terrain features, including, without limitation, soil or vegetation or environmental conditions surrounding the accident on April 4, 1975, which plaintiffs allege are related to any condition from which they now claim to suffer, all medical reports, records, memoranda, notes, x-rays, test results and similar documents produced by or on behalf of the deponent or

plaintiffs or plaintiffs' attorneys, and the deponents are hereby requested to produce all other documents, including, without limitation, maps, charts, illustrations, catalogs, photographs, slides or motion pictures reviewed or considered by the deponents with respect to any opinions they are expected to give at trial regarding the forces or environmental condition surrounding the accident on April 4, 1975, their examination of plaintiffs and/or their review of plaintiffs' medical record and history, whether such other documents were furnished to the deponent by plaintiffs, defendant or a third-party, or by any representative of plaintiffs.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 34 of the Federal Rules of Civil Procedure, the plaintiffs and the deponents are hereby requested to produce for inspection and copying at the above deposition the following documents and things in the possession, custody or contrroll of plaintiffs, their attorneys or expert witness pertaining or relating to or relied upon in connection with any claims by plaintiffs for the expert opinions to be rendered in this lawsuit including:

- (1) All reports, letters, data, analyses, drawings, photographs, slides, motion pictures, maps, charts, illustrations, catalogs, computer printouts, books, or any other documents or matter of whatever kind which deponents relied upon in forming an opinion as to any issue in these cases;
- (2) All reports, letters, data, analyses, drawings, photographs, slides, motion pictures, maps, charts, illustrations, catalogs, computer printouts, books, or any other documents or matter of whatever kind which deponents reviewed in forming an opinion as to any issue in these cases;
- (3) All articles, books, treatises, monographs, papers, films, graphs, charts or any other document or matter authored or partially authored by deponents relating to any issue in these cases;

- (4) All resumes, curricula, vitae, newspapers, magazine or journal articles, or advertisements concerning or relating to deponents.

Dated: Washington, D.C.
October 26, 1981

HAIGHT, GARDNER, POOR & HAVENS
Attorneys for Defendant
Lockheed Aircraft Corporation

By Carroll E. Dubuc
Carroll E. Dubuc
1819 H Street, NW
Washington, DC 20006
(202) 737-7847

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was hand-delivered this 26th day of October, 1981, to:

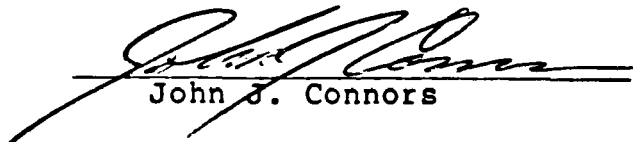
OREN R. LEWIS, JR., ESQ.
Lewis, Wilson, Lewis & Jones, Ltd.
2054 North 14th Street
Arlington, Virginia 22216

JAMES P. PIPER, ESQ.
Trial Attorney, Aviation Unit
Torts Section, Civil Division
U.S. Department of Justice
550 - 11th Street, N.W. - Rm. 906
Washington, D.C. 20530

CHARLES R. WORK, ESQ.
Peabody, Rivlin, Lambert & Meyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

and mailed postage prepaid to:

J. VERNON PATRICK, JR., ESQ.
Berkowitz, Lefkovits & Patrick
1400 City National Bank Bldg.
Birmingham, Alabama 35203


John J. Connors

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CHARLES R. WORK, ESQ.
Peabody, Rivlin, Lambert & Meyers
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

and mailed postage prepaid to:

J. VERNON PATRICK, JR., ESQ.
Berkowitz, Lefkovits & Patrick
1400 City National Bank Bldg.
Birmingham, Alabama 35203


John S. Connors

John Edwards -

^{partial}
Trial Testimony - 5/21/80

^{partial}
Trial Testimony - 5/31/80

Deposition - ()

William Timm

Trial Testimony - 3-18-80

Trial Testimony - 5-12-80

James Turnbow

Deposition - 8 Oct. 81

Report "Analysis of 'G' Levels

Associated with the C-5A

Accident near Sulphur - April 4,
1975

-
- Distribution pattern (4 April 75)
 - Description of events - ()
 - Jones article ()
 - Personnel location - ()

DEFT. EX. ~~DD~~- # 2

DATE: 10/31/81 Turner

REPORTER: ALBERT J. GASDOR

Various pictures

two reels of motion
pictures

Index to Plaintiff's Deposition Vol. I

Friday - 16 Oct. 81

at 0900

Second call - 19 Oct. 81
about 1520 -

Dr. Mike Cohen - 24 Oct. 81
30 Oct. 81

Lockheed Report No. LG145-46-2-2
30 Sept. 1988

Internal Loads Analysis Aft Fuselage

Lockheed Report No. LG14554-12-1
Inertia Loads Report.