

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

OIL STATES ENERGY )  
SERVICES, L.L.C., f/k/a )  
STINGER WELLHEAD )  
PROTECTION, INC., )  
Plaintiff, )

vs. ) CASE NO. 6:12-CV-611

TROJAN WELLHEAD )  
PROTECTION, INC., f/k/a )  
GUARDIAN WELLHEAD )  
PROTECTION, INC., and )  
GREENE'S ENERGY GROUP, )  
LLC, )  
Defendants. )

ORAL VIDEOTAPED DEPOSITION  
MURRAY DALLAS  
OCTOBER 28, 2014

ORAL VIDEOTAPED DEPOSITION OF MURRAY DALLAS,  
produced as a witness at the instance of the Defendants  
and duly sworn, was taken in the above-styled and  
numbered cause on the 28th day of October, 2014, from  
8:58 a.m. to 4:26 p.m., before Melinda Barre, Certified  
Shorthand Reporter in and for the State of Texas,  
reported by computerized stenotype machine at the  
offices of Morgan, Lewis & Bockius, 1000 Louisiana Street,  
Suite 4000, Houston, Texas, pursuant to the Federal Rules of  
Civil Procedure and the provisions stated on the record or  
attached hereto.

Job No. 86203

1 APPEARANCES

2  
3 FOR PLAINTIFF:

4 Mr. Archis Ozarkar

5 MORGAN LEWIS & BOCKIUS

6 1000 Louisiana Street

7 Houston, Texas 77002

8 -and-

9 Ms. Alison Vann

11 OIL STATES ENERGY SERVICES

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13 Houston, Texas 77002

14  
15  
16 FOR DEFENDANTS:

17 Mr. John Feldhaus

18 Mr. Bradley Roush

19 FOLEY & LARDNER

20 3000 K Street, NW

21 Washington, D.C. 20007

22  
23  
24 ALSO PRESENT: Jason Talmadge, Videographer

25

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1 (Exhibit 55 marked)

2 THE VIDEOGRAPHER: Today is Tuesday,  
3 October the 28th, the year 2014. The time now is  
4 approximately 8:58 a.m. We're on the record.

5 (Witness sworn)

6 MR. FELDHAUS: John Feldhaus, of Foley  
7 Lardner, for defendant Greene's Energy Group.

8 MR. ROUSH: Brad Roush, of Foley & Lardner  
9 LLP, for defendant Greene's Energy Group.

10 MR. OZARKAR: Neal Ozarkar, Morgan Lewis,  
11 for plaintiff, Oil States.

12 MURRAY DALLAS,  
13 having been first duly sworn, testified as follows:

14 EXAMINATION

15 QUESTIONS BY MR. FELDHAUS:

16 Q. Good morning, Mr. Dallas.

17 A. Hi.

18 Q. Could you state your full name for the record,  
19 please?

20 A. Lloyd Murray Dallas.

21 Q. And we've met before, have we not, sir?

22 A. Yeah.

23 Q. In fact, I took your deposition in the past.  
24 Is that right?

25 A. That's correct.

1 Q. And at that time you were deposed in your  
2 personal capacity. Are you aware of that?

3 A. Yes.

4 Q. Now, today you're appearing as a corporate  
5 representative for Oil States. Is that right?

6 A. Correct.

7 MR. FELDHAUS: And, Counsel, could we just  
8 stipulate for the record? My understanding is that  
9 Mr. Dallas is here to address topics 1, 2, 4, 5, 7  
10 through 12, 17, 22 through 24, 48 and 63 of Greene's  
11 notice of deposition, which actually I have here marked  
12 as Exhibit 55.

13 MR. OZARKAR: Yes. That seems correct.

14 A. Do I take that?

15 Q. (By Mr. Feldhaus) Yeah.

16 Mr. Dallas, could you look at Exhibit 55  
17 and look at topic 63, which reads "Stinger's corporate  
18 organization, management and personnel, since the time  
19 of its inception to the present."

20 So I understand, as counsel represented,  
21 you're here to address that topic for Oil States. Is  
22 that right?

23 A. Yes.

24 Q. Did you do anything to prepare for your  
25 deposition today?

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