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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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WESTERNGECO LLC,

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4:09-CV-01827

HOUSTON, TEXAS

07:33

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PLAINTIFF,

.

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vs.

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ION GEOPHYSICAL  
CORPORATION, FUGRO GEOTEAM,  
INC., ET AL,

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DEFENDANTS

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VOLUME 13

AUGUST 9, 2012

7:34 A.M.

07:33

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TRANSCRIPT OF JURY TRIAL  
BEFORE THE HONORABLE KEITH P. ELLISON  
UNITED STATES DISTRICT JUDGE

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*LoCascio Cross of David Gentle*

13:42 1 your reference."

2 They told you -- you already knew anyway -- that  
3 the parties had previously executed -- that means signed -- and  
4 agreed to a document, right?

13:42 5 A Yes. At one time, that was signed, yes.

6 Q And you mentioned you weren't sure that they told you they  
7 were adding indemnity, sir.

8 Is that what you said a minute ago?

9 A That's what I said, yes.

13:43 10 Q We look at the contract in November. They specifically  
11 discuss the indemnity provision, right?

12 A That's right.

13 Q And this is October 18, 2011. If we look on October 19,  
14 you respond. At this point, this late October 2011 period,  
15 Fugro had requested indemnity from ION, right?

16 A There were discussions at the senior level management about  
17 indemnity.

18 Q And you were involved in the emails back and forth with  
19 Fugro on that very topic, correct?

13:44 20 A Which emails, sorry?

21 Q The emails we are looking at about the contract language.

22 A Yes, that's correct.

23 Q And within a week of that, on October 27, 2011, you sat  
24 down in a room under oath to give a deposition in this case,  
13:44 25 correct?

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