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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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WESTERNGECO LLC, . 4:09-CV-01827  
HOUSTON, TEXAS

07:33 5

PLAINTIFF, .

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vs. .

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ION GEOPHYSICAL .  
CORPORATION, FUGRO GEOTEAM, .

8

INC., ET AL, .

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DEFENDANTS . VOLUME 13  
AUGUST 9, 2012

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. . . . . 7:34 A.M.

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

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A P P E A R A N C E S:

07:33 15

FOR THE PLAINTIFF:

16

Lee K. Kaplan  
SMYSER KAPLAN & VESELKA LLP  
Bank of America Center  
700 Louisiana, Suite 2300  
Houston, Texas 77002

19

07:33 20

Gregg F. LoCascio  
KIRKLAND & ELLIS LLP  
655 Fifteenth Street Northwest  
Washington, DC 20005

21

22

Sarah Tsou  
Timothy K. Gilman  
KIRKLAND & ELLIS LLP  
Citigroup Center  
153 East 53rd Street  
New York, New York 10022

23

24

07:33 25

Mayra Malone, CSR, RMR, CRR  
mayramalone@comcast.net

**APPEARANCES - CONTINUED**

07:33

1

2

3

FOR THE DEFENDANT:

4

David L. Burgert  
Susan Kopecky Hellinger

07:33

5

Jonathan M. Pierce  
Jonna N. Stallings

6

Ray T. Torgerson  
Eric D. Wade

7

PORTER & HEDGES LLP  
Reliant Energy Plaza  
1000 Main Street, 36th Floor  
Houston, Texas 77002

9

07:33

10

FOR FUGRO GEOTEAM, INC.:

11

Gordon T. Arnold  
Jason A. Saunders  
ARNOLD KNOBLOCH LLP  
4900 Woodway Drive  
Suite 900  
Houston, Texas 77056

12

13

14

07:33

15

James M. Thompson  
Christine Raborn  
Michael E. Streich  
ROYSTON RAYZOR VICKERY & WILLIAMS LLP  
Pennzoil Place  
711 Louisiana Street, Suite 500  
Houston, Texas 77002

16

17

18

19

07:33

20

21

22

23

24

25

Mayra Malone, CSR, RMR, CRR  
mayramalone@comcast.net

07:33

1

*APPEARANCES - CONTINUED*

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OFFICIAL COURT REPORTER:

07:33

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Mayra Malone, CSR, RMR, CRR  
U.S. Courthouse  
515 Rusk, Room 8016  
Houston, Texas 77002

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Mayra Malone, CSR, RMR, CRR  
mayramalone@comcast.net

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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?

Mayra Malone, CSR, RMR, CRR  
mayramalone@comcast.net

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