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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

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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 . VOLUME 13
. AUGUST 9, 2012
. 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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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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