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00001
               Clerk's stamp:
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  COURT FILE NUMBER
                         1601-05647
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5 COURT OF QUEEN'S BENCH OF ALBERTA
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7
  JUDICIAL CENTRE CALGARY
8
9 APPLICANT(S)
                   BAKER HUGHES INCORPORATED, BAKER
10
             HUGHES OILFIELD OPERATIONS, INC.,
11
             PEGASI ENERGY RESOURCES
12
             CORPORATION, PEGASI OPERATING,
13
             INC., WEATHERFORD INTERNATIONAL
14
             LLC, WEATHERFORD/LAMB,
15
             INC., WEATHERFORD US, LP,
16
             WEATHERFORD ARTIFICIAL LIFT
17
             SYSTEMS, LLC, and PEAK COMPLETION
18
             TECHNOLOGIES, INC.
19
20 RESPONDENT(S)
                     ROSEANN CALDWELL
21
22 DOCUMENT
                 QUESTIONING ON AFFIDAVIT
23
24 QUESTIONING OF LEAH ALISHA BURATTI VIA TELECONFERENCE
25 BY E.B. MELLETT
26 AFFIDAVIT SWORN MAY 2, 2016
27 HELD MAY 18, 2016
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2 Taken before Karoline Schumann, Official Court
3 Reporter, pursuant to Rules 5.26, 6.20, and 13.46 of
4 the Court of Queen's Bench of Alberta, at the offices
5 of Blake, Cassels & Graydon LLP, Calgary, Alberta.
7 FOR BAKER HUGHES AND PEGASI GROUP OF COMPANIES:
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9 J. Sealy-Harrington
10 M. O'Brien
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21 FOR THE RESPONDENT(S):
22 E.B. Mellett
23 Bennett Jones Calgary LLP
24 4500, 855-2 Street SW
25 Calgary, Alberta
26 403-298-3100
```



- 1 OFFICIAL COURT REPORTER:
- 2 Karoline Schumann, CSR(A)
- 3 Dicta Court Reporting Inc.
- 4 760, 1015-4 Street SW
- 5 Calgary, Alberta
- 6 403-531-0590

- 8 (PROCEEDINGS COMMENCED AT 2:07 PM)
- 9 LEAH ALISHA BURATTI, Affirmed, Cross-examined by
- 10 Mr. Mellett
- 11 Q MR. MELLETT: Good afternoon, Ms. Buratti.
- 12 My name is Bruce Mellett. I'm representing Roseann
- 13 Caldwell on this application, and I appreciate you
- 14 making yourself available for this examination today.
- 15 Now, Ms. Buratti, if there are any questions or
- 16 difficulties hearing me because of the technology,
- 17 please don't hesitate to let me know, and I'll try and
- 18 do my best to speak more clearly to assist.
- 19 So, Ms. Buratti, do you have a copy of the
- 20 affidavit that was filed with the Court of Queen's
- 21 Bench of Alberta, dated May 5th, 2016?
- 22 A I do.
- 23 Q And although it's not on the document which I have been
- 24 provided, it's my understanding that this affidavit is
- 25 filed in Court File Number 1601-05647?
- 26 MR. McGRATH: That's correct.
- 27 MR. MELLETT: Thank you.



- 1 Q MR. MELLETT: And, Ms. Buratti, this was an
- 2 affidavit which you filed in support of a request by
- 3 the Texas court to the Alberta court for letters
- 4 rogatory in relation to Roseann Caldwell?
- 5 A That's correct.
- 6 Q Now, at paragraph 1 of your affidavit, you indicate
- 7 that you're employed as an attorney and
- 8 counsellor-at-law by Baker Hughes Incorporated and
- 9 Baker Hughes Oilfield Operations, Inc.; is that
- 10 correct?
- 11 A That's correct; I represent them.
- 12 Q So you represent Baker Hughes Incorporated and Baker
- 13 Hughes Oilfield Operations by virtue of being an
- 14 associate attorney at the law firm of McKool Smith?
- 15 A That's correct.
- 16 Q So to be clear then, you're not employed as an employee
- 17 of Baker Hughes Incorporated or Baker Hughes Oilfield
- 18 Operations? Sorry, Ms. Buratti, I didn't catch the
- 19 last answer.
- 20 A Oh, I said, that's right. I am not a full-time
- 21 employee of Baker Hughes Incorporated or Baker Hughes
- 22 Oilfield Operations. I am employed by them by virtue
- 23 of being an associate with McKool Smith.
- 24 Q So being an associate with McKool Smith?
- 25 A Yes.
- 26 Q And McKool Smith, as I understand it, is a law firm
- 27 with a number of offices throughout the United States?



- 1 A That's correct.
- 2 Q And one of the areas of specialty that McKool Smith
- 3 practices in is patent litigation?
- 4 A That's correct.
- 5 Q And you are an associate who works in that area of
- 6 patent litigation at McKool Smith?
- 7 A Yes.
- 8 Q And, Ms. Buratti, you are one of the team of attorneys
- 9 who are acting on behalf of Baker Hughes Incorporated
- 10 and Baker Hughes Oilfield Operations in relation to
- 11 United States District Court proceedings in Civil
- 12 Action Number 6:15-cv-724-RWS-KNM?
- 13 A I don't have the Civil Action Number memorized, but I
- 14 will take your word for it that that is the correct
- 15 Action Number.
- 16 Q Okay, well, I'll just refer you to Exhibit A of your
- 17 affidavit and have you look at the style of cause in
- 18 that pleading.
- 19 A Yes, it is Civil Action Number 6:15-cv-724.
- 20 Q So you're one of the team of attorneys acting on behalf
- 21 of Baker Hughes Incorporated and Baker Hughes Oilfield
- 22 Operations in that litigation?
- 23 A Yes.
- 24 Q Now, Ms. Buratti, can you turn to Exhibit F to your
- 25 affidavit, please.
- 26 A I'm there.
- 27 Q And as I understand it, this is the formal request for



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