

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE: VITAMINS ANTITRUST LITIGATION

MDL No. 1285
Misc. No. 99-0197 (TFH)

THIS DOCUMENT RELATES TO:
ALL ACTIONS

FILED

MAY 24 2002

**NANCY MAYER WHITTINGTON CLERK
U.S. DISTRICT COURT**

STIPULATION

On behalf of Plaintiffs and Defendant E.I. DuPont de Nemours and Company

("DuPont"), the parties agree as follows:

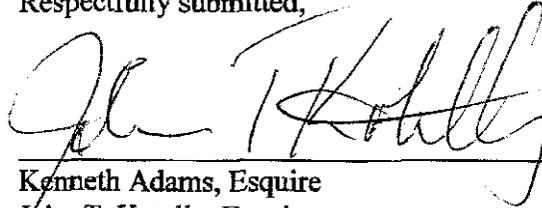
1. The plaintiffs noticed the depositions of current DuPont employees Barry Granger and William White, and former DuPont employee Keith Smith on February 8, 2002;
2. Plaintiffs scheduled the deposition of Mr. White for April 19, 2002, however, subsequently cancelled this date. The depositions of Messrs. Granger and Smith were held "in abeyance" until plaintiffs determined their need to take these depositions.
3. The Court granted Plaintiffs' Motion to Compel Documents Responsive to Plaintiffs' Third Request on May 6, 2002. On May 8, 2002, Plaintiffs renewed their request to take the depositions of Messrs. White, Granger and Smith.
4. DuPont produced its documents in response to the Court's Order and Plaintiffs consent on May 15 and 17, 2002.
5. DuPont has agreed to proceed with the depositions of Messrs. Granger and White on May 29, 2002 in Wilmington, Delaware.
6. In addition, should Mr. Smith, a former DuPont employee, voluntarily agree to appear for a deposition in the United States, counsel for DuPont will notify Plaintiffs of such

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consent. Within 3 days of such notification, Plaintiffs will indicate in writing their intent to proceed with the deposition, and will **take** the deposition of Mr. Smith within 7 days thereafter or on a later date if **necessary** to accommodate the witness' schedule.

Dated: May 21, 2002

Respectfully submitted,



Kenneth Adams, Esquire
John T. Kotelly, Esquire
Dickstein Shapiro
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On Behalf of Plaintiffs



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One James Center
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On Behalf of Defendant E.I. DuPont de Nemours &
Company

SO ORDERED:

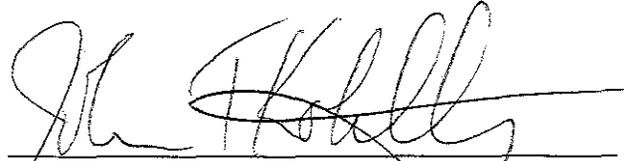


The Honorable Thomas F. Hogan

Dated: May 23, 2002

CERTIFICATE OF SERVICE

I, John T. Kotelly, hereby certify that on this 22nd day of May, 2002, I served true and correct copies of the Stipulation upon counsel of record in these consolidated cases utilizing the Verilaw electronic service procedure pursuant to the 5/17/00 Stipulated Order Regarding Electronic Service.

A handwritten signature in black ink, appearing to read "John T. Kotelly", written over a horizontal line.

John T. Kotelly
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