

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

In re: Bausch & Lomb Contact Lens )  
Solution Products Liability Litigation ) MDL No: 1785  
)  
) C/A No. 2:06-MN-77777-DCN  
)  
)  
This Notice Relates To: All Cases )  
)  
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**CROSS-NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that the deposition of the following person will be taken upon oral examination as set out below:

Deponent: **Barrie Fee**  
Date: May 2, 2007  
Time: 10:00 a.m.  
Location: Nixon Peabody, LLP  
1100 Clinton Square  
Rochester, NY 14604

This deponent will appear pursuant to the New York Rules of Civil Procedure at the time and place specified above to give testimony in *In re: New York ReNu with MoistureLoc Product Liability Litigation*, Index No. 766,000/2007, Supreme Court of the State of New York County of New York, regarding Bausch & Lomb's organizational structure. This deposition is cross-noticed in the above-captioned matter for any and all purposes permitted by the New York Rules of Civil Procedure, and any federal, state or local rules that apply to this action, and the deposition will be taken in accordance with these rules. In addition, the deposition will be taken in the presence of a certified court reporter and videographer provided by Plaintiffs.

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By: s/ELI A. POLIAKOFF

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*Attorneys for Bausch & Lomb Incorporated*

April 10, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **CROSS NOTICE OF DEPOSITION OF BARRIE FEE** has been served upon the parties to this action by sending copies thereof via electronic mail addressed to:

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April 10, 2007

s/ ELI A. POLIAKOFF  
\_\_\_\_\_  
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