

# HPM&B

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April 15, 2008

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Re: New York ReNu with MoistureLoc Product Liability  
Our File No.: 622-1001

Dear Counselors:

Attached please find the cross notice for the deposition of Joe Salamone on April 30, 2008. Documents used in this deposition may be subject to a Protective Order entered in this case or by the MDL Court. Anyone attending this deposition must agree to be bound by such a protective order. If you plan to attend, please contact Sherry Durgan at 816-474-6550 by April 22, 2008 to coordinate and to address any issues specific to the protective order. The call-in number for this deposition will be (888) 331-4920, Conference Code 5568743311.

Very truly yours,

  
Scott M. Zimmerman

SMZ/GS/av  
Enclosure

519890.1

cc: **Via E-mail Only**  
John H. Beisner, Esq.  
Michael T. Cole, Esq.  
Hope S. Freiwald, Esq.  
Harvey L. Kaplan, Esq.  
Marie S. Woodbury, Esq.

PRESENT: Honorable Helen E. Freedman, J.S.C.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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IN RE: NEW YORK RENU WITH MOISTURELOC  
PRODUCT LIABILITY LITIGATION

Index No. 766,000/2007

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THIS DOCUMENT APPLIES 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: **Joe Salamone**  
Date: April 30, 2008, and from day to day until completed  
Time: Beginning at 9:00 a.m. each day  
Location: Ritz Carlton – Palm Beach  
100 South Ocean Boulevard  
Manalapan, FL 33462

This deponent will appear pursuant to the Federal Rules of Civil Procedure at the time and place specified above to give testimony in *In re: Bausch & Lomb, Inc. Contact Lens Solution Products Liability Litigation*, Index No. 2:06-MN-77777, United States District Court, District of South Carolina, Charleston Division. This deposition is cross-noticed in the above-captioned matter for any and all purposes permitted by the 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 may be videotaped.

Dated: New York, New York  
April 15, 2008

Yours, etc.

HEIDELL, PITTONI, MURPHY & BACH, LLP

By:



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