

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

In re Bausch & Lomb Inc. Contact Lens  
Solution Products Liability Litigation

MDL Docket No. 1785

C/A NO. 2:06-MN-77777-DCN

**CROSS-NOTICE OF DEPOSITION OF DAVID HANLON**

Please take notice that, per the agreement of counsel, the deposition of the following person will be taken upon oral examination as set out below:

Deponent:	<b>David Hanlon</b>
Date:	June 10, 2008 and from day to day until completed
Time:	9:00 a.m.
Location:	Burg Simpson Eldredge Hersh & Jardine, P.C. 40 Inverness Drive East Englewood, CO 80112

This deponent will appear pursuant to Federal Rules of Civil Procedure at the time and place specified above to give testimony in *In re: New York ReNu with MoistureLoc Litigation*, Index No. 766,000/2007, Supreme Court of the State of New York, County of New York. This deposition is cross-noticed in the above-captioned matter for any and all purposes permitted by the Federal Rules of Civil Procedure, and any other 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 it will be recorded stenographically and by videotape or some other video medium.

This the 7<sup>th</sup> day of May, 2008.

/s/ James L. Ward, Jr.

H. Blair Hahn, Esq.  
James L. Ward, Jr., Esq.  
RICHARDSON PATRICK WESTBROOK &  
BRICKMAN, LLC  
1037 Chuck Dawley Blvd., Bldg. A  
P.O. Box 1007 (29465)  
Mt. Pleasant, SC 29464  
(843) 727-6500

Mitchell M. Breit, Esq.  
WHATLEY, DRAKE & KALLAS, LLC  
2323 2nd Avenue North  
Birmingham, AL 35203  
(205) 328-9576

Wendy R. Fleishman, Esq.  
LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP  
780 Third Avenue, 48th Floor  
New York, NY 10017-2024  
(212) 355-9500

Daniel E. Becnel, Jr., Esq.  
BECNEL LAW FIRM, LLC  
P.O. Drawer H  
106 W. Seventh St.  
Reserve, LA 70084  
(985) 536-1186

Personal Injury Plaintiffs' Executive Committee

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **CROSS-NOTICE OF TAKING VIDEOTAPED DEPOSITION OF DAVID HANLON** has been served upon the parties to this action by sending a copy thereof via electronic mail addressed to:

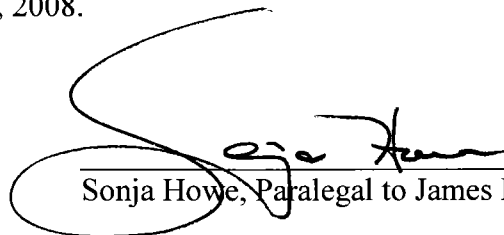
Harvey Kaplan  
Shook Hardy & Bacon, LLP  
2555 Grand Boulevard  
Kansas City, MO 64108  
[hkaplan@shb.com](mailto:hkaplan@shb.com)

Marie Woodbury  
SHB Bausch & Lomb, Inc.  
2555 Grand Boulevard  
Kansas City, MO 64108  
[mwoodbury@shb.com](mailto:mwoodbury@shb.com)

John Beisner  
O'Melveny & Myers, LLP  
1625 Eye Street, NW  
Washington, DC 20006  
[jbeisner@omm.com](mailto:jbeisner@omm.com)

Michael T. Cole  
Nelson Mullins Riley & Scarborough  
151 Meeting Street, Suite 600  
Charleston, SC 29401  
[mike.cole@nelsonmullins.com](mailto:mike.cole@nelsonmullins.com)

This the 7<sup>th</sup> day of May, 2008.

  
\_\_\_\_\_  
Sonja Howe, Paralegal to James L. Ward, Jr.