

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

In re Bausch & Lomb Inc. Contact Lens Solution Products Liability Litigation)	C/A NO. 2:06-MN-7777-DCN
_____)	
THIS DOCUMENT RELATES TO:)	MDL Docket No. 1785
)	
ALL CASES)	
_____)	JUDGE NORTON

SECOND AMENDED NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rules 26, 30 and 45 of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition upon oral examination of Lisa Tinsley beginning September 6, 2007 at 10:00 a.m. at Doffermyre, Shields, Canfield, Knowles & Devine, 1355 Peachtree Street, Suite 1600, Atlanta, GA 30309 and will resume on September 7, 2007 beginning at 10 a.m. until completed. The deposition will be taken before a Notary Public or some other person authorized by Rule 28 of the Federal Rules of Civil Procedure to administer oaths, and it will be recorded stenographically and by videotape or some other video medium. A subpoena *duces tecum* and *ad testifiandum* directed to Lisa Tinsley is attached hereto.

This the 26th day of July, 2007.

James L. Ward, Jr.

James L. Ward, Jr. (Fed. ID # 6956)
Richardson, Patrick, Westbrook & Brickman, LLC
1037 Chuck Dawley Blvd., Bldg. A (29464)
Post Office Box 1007
Mt. Pleasant, SC 29465
(843) 727-6500 (tel.)
(843) 216-6509 (fax)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **SECOND AMENDED NOTICE OF DEPOSITION OF LISA TINSLEY** has been served upon the parties to this action by sending copies thereof via electronic mail addressed to:

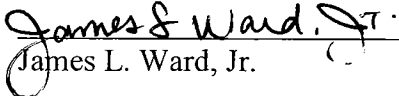
Harvey Kaplan
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Charleston, SC 29401
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This the 26th day of July, 2007.


James L. Ward, Jr.

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA

IN RE BAUSCH & LOMB INC. CONTACT LENS
SOLUTION PRODUCTS LIABILITY LITIGATION

SUBPOENA IN A CIVIL CASE
DUCES TECUM AND AD TESTIFICANDUM

THIS DOCUMENT RELATES TO:

Case No.: 2:06-mn-77777

ALL CASES

JUDGE NORTON

TO: Lisa Tinsley
Ciba Vision Corporation
11460 Johns Creek Parkway
Duluth, GA 30097

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION Doffermyre Shields Canfield Knowles & Devine 1355 Peachtree Street, Suite 1600 Atlanta, GA 30309 404-881-8900	DATE AND TIME September 6 & 7, 2007 beginning @ 10:00 a.m. EDT each day
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **See attached Exhibit "A"**

PLACE Doffermyre Shields Canfield Knowles & Devine 1355 Peachtree Street, Suite 1600 Atlanta, GA 30309 404-881-8900	DATE AND TIME September 6 & 7, 2007 beginning @ 10:00 a.m. EDT each day
--	---

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  ATTORNEY FOR PLAINTIFFS	DATE July 26, 2007
--	-----------------------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
James L. Ward, Jr., Esquire, 1037 Chuck Dawley Blvd., Bldg. A, Mt. Pleasant, SC 29464 (843.727.6500)

“EXHIBIT A”

As used in this exhibit, the term “document” shall include all tangible means by which human communication is transmitted or stored, physically or electronically, including all forms of written, handwritten, typed, graphic, recorded or printed material in its entirety, with any addenda, supplements, amendments, revisions, exhibits and appendices thereto, and in its original form (or copies thereof where originals are unavailable, such copies to include the front and back of the document when there is written, typed, graphic, recorded or printed material on the back). A draft or non-identical copy is a separate document within the meaning of this term.

1. Your curriculum vitae or resume;
2. All documents regarding Bausch & Lomb;
3. All documents regarding ReNu® MoistureLoc®;
4. All documents regarding the Bausch & Lomb Greenville, South Carolina facility;
5. All documents regarding the federal Food and Drug Administration;
6. All documents regarding the South Carolina Department of Health;
7. All documents regarding or relating to *fusarium* fungus;
8. All agreements between Bausch & Lomb and any of its current employees;
9. All agreements between Bausch & Lomb and any of its former employees;
10. Your personnel file and all documents regarding your employment at Bausch & Lomb.

**IN THE UNITED STATES DISTRICT COURT
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Solution Products Liability Litigation)	
_____)	
THIS DOCUMENT RELATES TO:)	MDL Docket No. 1785
_____)	
ALL CASES)	
_____)	JUDGE NORTON

**ACKNOWLEDGMENT OF RECEIPT OF SUBPOENA AND
ACCEPTANCE OF SERVICE**

I hereby accept service of the subpoena in the above-referenced matter, and retain a copy of the same.

Lisa Tinsley
Ciba Vision Corporation
11460 Johns Creek Parkway
Duluth, GA 30097

Sign: _____

Print: _____

Date: _____