

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

In re: Oil Spill by the Oil Rig  
"Deepwater Horizon" in the Gulf  
Of Mexico, on April 20, 2010

\* MDL No. 2179  
\*  
\* SECTION: J  
\*  
\* JUDGE BARBIER  
\* MAGISTRATE SHUSHAN

Applies to: *All Cases.*

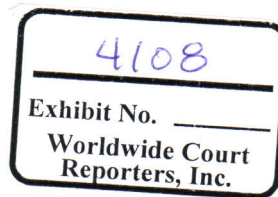
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**SUPPLEMENTAL 30(b)(6) DEPOSITION NOTICE OF BP DEFENDANTS**

In accordance with this Court's Order Regarding Cameron's Topics for BP's Rule 30(b)(6) Deposition (Rec. d. 2975), and upon subsequent agreement between Counsel for Defendant Cameron International Corporation ("Cameron") and Counsel for Defendants, BP Exploration & Production, Inc., BP p.l.c., BP America Production Company, and BP North America Products, Inc. (collectively "BP Defendants"), the BP Defendants shall, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Pre-Trial Order 17, as supplemented and amended by Pre-Trial Order 27, and in addition to the current Agreed 30(b)(6) Deposition Notice of BP Defendants (LN 36650565), designate and produce one or more officers, managers, agents, employees, or other representatives of the BP Defendants to discuss the Supplemental Areas of Inquiry identified below. The times and locations of the depositions will be scheduled in conjunction with the fact depositions of the designees in their individual capacities, or otherwise as may be scheduled with Judge Shushan and the parties.

**Supplemental Areas of Inquiry**

1. The alternative BOP designs alleged in paragraph no. 56 of BP's cross-claim against Cameron.
2. The maintenance of or modifications to the BOP by Cameron alleged in BP's cross-claim against Cameron.



3. BP's use of Cameron subsea BOPs in Gulf of Mexico deepwater wells (other than Macondo) during the period April 20, 2005 - April 20, 2010; namely:
- a. The identity of the rigs that used such BOPs;
  - b. The identity of the wells drilled with such BOPs;
  - c. The configuration of the BOP stack on such rigs, including the number and type of ram-type and annular preventers; and
  - d. The use of secondary intervention or secondary control systems on such BOPs during an emergency situation.

Respectfully submitted,

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**ATTORNEYS FOR  
CAMERON INTERNATIONAL  
CORPORATION**

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing Supplemental Notice of 30(b)(6) Deposition of BP Defendants has been served on All Counsel by electronically uploading the same to Lexis Nexis File & Serve in accordant with Pretrial Order No. 12, on this 5th day of July, 2011.

/s/ Phillip A. Wittmann

