



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

In re: Oil Spill by the Oil Rig * MDL No. 2179
"Deepwater Horizon" in the Gulf *
Of Mexico, on April 20, 2010 * SECTION: J
*
Applies to: *All Cases.* * JUDGE BARBIER
* MAGISTRATE SHUSHAN
* * * * *

CAMERON'S RULE 26(a)(2)(C) DISCLOSURES

TO THE HONORABLE JUDGE BARBIER:

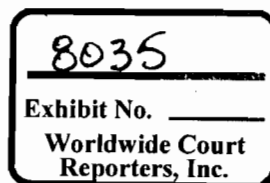
Cameron International Corporation ("Cameron") respectfully submits, in addition to the disclosures required by Rule 26(a)(1), the following disclosure of potential expert testimony pursuant to Fed. R. Civ. P. 26(a)(2)(C):

I. Cameron Witnesses

Cameron provides the following disclosure of potential expert testimony it may offer from certain witnesses employed by Cameron who have been deposed or will be deposed. This designation is made out of an abundance of caution with the assumption that some of the elicited testimony from the deposition could technically be construed as "expert" testimony within the meaning of Fed. R. Evid. 701, et seq. and Fed. R. Civ. P. 26. As such, Cameron reserves the right to change the scope of this designation.

1. David McWhorter: Mr. McWhorter is currently employed by Cameron as the Vice President of Engineering and Quality for the Drilling Division.

Summary of Facts and Opinions: Mr. McWhorter testified as to all aspects of blowout preventer design, manufacture, and operation, including capabilities and limitations of



blowout preventers in general and the configuration of the blowout preventer on the Macondo well.

2. Edward Gaudé: Mr. Gaudé is currently employed by Cameron as the Director of Engineering for Drilling Control Systems.

Summary of Facts and Opinions: Mr. Gaudé testified as to all aspects of design, manufacture, and operation of the mechanical and hydraulic components and functions of blowout preventer controls systems including capabilities and limitations of the mechanical and hydraulic components and functions of blowout preventer control systems in general and the configuration of the blowout preventer control system on the Macondo well.

3. Richard Coronado: Mr. Coronado is currently employed by Cameron as the Engineering Manager, Drilling Systems Controls.

Summary of Facts and Opinions: Mr. Coronado has yet to be deposed, but it is anticipated that his testimony will related to all aspects of design, manufacture, and operation of the electronic components and functions of blowout preventer controls systems including capabilities and limitations of the electronic components and functions of blowout preventer control systems in general and the configuration of the blowout preventer control system on the Macondo well.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document has been served on All Counsel by electronically uploading the same to Lexis Nexis File & Serve in accordance with Pretrial Order No. 12, on this 17th day of October, 2011.

/s/ David J. Beck

David J. Beck