



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
* MAG. JUDGE SHUSHAN

This Document Relates to All Cases

**NOTICE OF VIDEO DEPOSITION
PURSUANT TO FED. R. CIV. P 30(b)(6)**

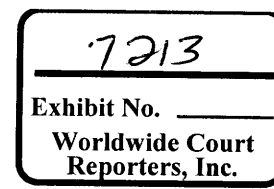
To: ADD ENERGY GROUP AS AND ADD WELLFLOW AS

PLEASE TAKE NOTICE that the video deposition of add energy group as and add wellflow as (collectively "ADD") will be taken under oath and pursuant to Fed. R. Civ. P. 30(b)(6) and Pre-Trial Orders 17 and 27 on Thursday June 23 and Friday, June 24, 2011, commencing at 8:30 a.m., in the offices of Kirkland & Ellis International LLP, 30 St. Mary Axe, London, EC3A 8AF, United Kingdom, before a notary public or other person authorized to administer oaths. The deposition will be recorded by audio, stenographic and videographic means.

ADD shall testify regarding the following deposition topics and produce the following requested documents, in accordance with the following Definitions and Instructions:

DEFINITION & INSTRUCTIONS

1. "Document" shall mean any printed, type-written or handwritten matter of whatever character, including, without limitation, the original and each non-identical copy of each and any writing, memorandum, letter, e-mail, correspondence, telegram, note, minutes, contract, agreement, interoffice and intraoffice communications, procedure, pamphlet, diary,



record or note of telephone conversation, chart, schedule, entry, print, representation, record, report, photograph and any tangible item or thing of written, readable, graphic, audible, or visual material.

2. In those instances where requested documents are stored only on software or other data compilations, the responding party should either produce the raw data along with all codes, programs and metadata for translating it into usable form or produce the information in a finished usable form, which would include all necessary glossaries, keys and indices for interpretation of the material.

3. "Communication" shall mean and include any transmission or exchange of any information, whether orally or in writing, including, without limitation, any conversation or discussion by means of letter, note, memorandum, inter-office correspondence, telephone, electronic mail, telegraph, telex, telecopies, cable communicating data processors, or some other electronic or other medium.

4. "BP" means, without limitation, BP EXPLORATION AND PRODUCTION, INC., BP AMERICA, INC., BP AMERICA PRODUCTION COMPANY, and BP, P.L.C., including their predecessors, successors, subsidiaries, departments, divisions, attorneys, accountants, and current and former directors, officers, employees, agents, representatives and persons acting on their behalf.

DEPOSITION TOPICS

1. The report prepared by ADD for BP's internal Investigation Team entitled *Dynamic Simulations -- Deepwater Horizon Incident*, and dated 29 August, 2010 (the "Report").

2. All information and data received, generated, reviewed or relied upon in preparing the Report.

3. All opinions reached by ADD and all studies and reports prepared by ADD in connection with the Deepwater Horizon Incident on April 20, 2010.

4. The educational and professional qualifications and employment history of each author of the Report.

5. All work performed by ADD for BP since January 1, 2005 and all monies paid by BP in connection with such work.

6. All communications between ADD Energy and BP regarding the Deepwater Horizon Incident of April 20, 2010.

DOCUMENTS REQUESTED

1. All drafts and versions of the Report.

2. All raw data and information received, generated, reviewed or relied upon in preparing the Report.

3. All documents evidencing any communications between ADD and BP regarding the Report or the Deepwater Horizon Incident of April 20, 2010.

4. Documents sufficient to show all payments by BP to ADD in connection with the Report.

5. Documents sufficient to show total payments by BP to Add or any affiliate of ADD since January 1, 2005.

YOU ARE HEREBY invited to attend and participate as you deem necessary.

DATED: June 15, 2011

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/s/

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CERTIFICATE OF SERVICE

I certify that on this 15th day of June, 2011 I caused a copy of the foregoing Notice of Deposition to be served on all parties through the Lexis-Nexis File and Serve system.

/s/
Warren Anthony Fitch