

1 **WEST VIRGINIA MINE SAFETY AND HEALTH**
2 **ADMINISTRATION**

3
4 **IN THE MATTER OF:**

5 **THE INVESTIGATION OF THE**
6 **APRIL 5, 2010 MINE EXPLOSION**
7 **AT UPPER BIG BRANCH MINE**

8
9
10
11 The interview of RAGHUVVEER R. THADISINA, taken
12 upon oral examination, before Lynne M. Rodriguez,
13 Registered Professional Reporter and Notary Public
14 in and for the State of West Virginia, Monday,
15 November 1, 2010, at 3:00 p.m., at the Mine
16 Academy, 1301 Airport Road, Beaver, West Virginia.

17
18
19
20
21 **JOHNNY JACKSON & ASSOCIATES, INC.**
22 606 Virginia Street, East
23 Charleston, WV 35301

24 (304) 346-8340

APPEARANCES

1
2 **OFFICE OF MINERS' HEALTH, SAFETY & TRAINING**
3 **Barry L. Koerber, Assistant Attorney General**
4 **1615 Washington Street, E.**
5 **Charleston, WV 25311**
6 **(304) 558-1425**

7
8 **OFFICE OF MINERS' HEALTH, SAFETY & TRAINING**
9 **John O'Brien**
10 **1615 Washington Street, E.,**
11 **Charleston, WV 25311**
12 **(304) 558-1425**

13
14 **U.S. DEPARTMENT OF LABOR**
15 **Office of the Regional Solicitor**
16 **Derek J. Baxter, Esq.**
17 **baxter.derek@dol.gov**
18 **1100 Wilson Blvd.**
19 **22nd Floor West**
20 **Arlington, VA 22209**
21 **(202) 693-9389**

22
23 **MINE SAFETY AND HEALTH ADMINISTRATION**
24 **Eric Sherer**

GOVERNOR'S INDEPENDENT INVESTIGATION PANEL
J. Davitt McAteer, Esq.

ALLEN, GUTHRIE & THOMAS, PLLC
Robert H. Akers, Esq.
rhakers@agmtlaw.com
500 Lee Street, E.
Suite 800
P.O. Box 3394
Charleston, WV 25333-3394
(304) 345-7250

SHUMAN, MCATEER & SLICER, PLLC
Brian Warner, Esq.
1411 Virginia Street, E., Suite 200
P.O. Box 3953
Charleston, WV 25339-3953
(304) 345-1400

APPEARANCES CONTINUED

ALSO PRESENT: Norman Page, MSHA
Sandin Phillipson, MSHA
John Godsey, MSHA
Tim Watkins, MSHA

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

EXAMINATION INDEX

Raghuveer Thadisina

BY MR. KOERBER	11
BY MR. O'BRIEN	14
BY MR. SHERER	17
BY MR. MCATEER	22
BY MR. O'BRIEN	28
BY MR. MCATEER	28

EXHIBIT INDEX

Thadisina

1 Copy of Subpeona	12
--------------------	----

1 MR. KOERBER: My name is Barry
2 Koerber. I'm an Assistant Attorney
3 General and I'm assigned to represent the
4 West Virginia Office of Miners' Health,
5 Safety and Training. Today is November 1,
6 2010. With me is an investigator from the
7 Office of Miners' Health, Safety and
8 Training also, who will be asking the
9 interview questions on behalf of the
10 office today. I'd ask that he identify
11 himself.

12 MR. O'BRIEN: John O'Brien.

13 MR. KOERBER: And we also have
14 two other accident investigation teams
15 present doing joint interviews for the
16 sake of not making you come in three
17 different times for three different sets
18 of interviews. I would ask that those
19 individuals identify themselves and who
20 they are with.

21 MR. SHERER: I'm Eric Sherer with
22 MSHA.

23 MR. BAXTER: I'm Derek Baxter,
24 with the Office of the Solicitor,

1 Department of Labor.

2 MR. MCATEER: I'm Davitt McAteer
3 with the Governor's Special
4 Investigation.

5 MR. KOERBER: And we have a court
6 reporter here today and she'll be
7 transcribing everything that's said today,
8 so I would ask that instead of nodding
9 your head "Yes" and "No," you use the word
10 "Yes" or "No," as the case may be. I
11 would also ask that you speak loudly so
12 that she can hear what you're saying.

13 I would ask that you wait until
14 the interviewers have finished their
15 question before you begin your answer and
16 I'd ask the interviewers to wait until you
17 have finished your answer before they
18 begin the question, so that you don't have
19 people talking over each other.

20 The court reporter is with a
21 company by the name of Johnny Jackson &
22 Associates. Their firm is located in
23 Charleston, West Virginia. They're
24 operating under a three day turn-around

1 for the transcription of the interviews
2 themselves, which means come this Friday,
3 November the 5th, the transcript of this
4 interview should be prepared and you
5 and/or you and your attorney are welcome
6 to call Johnny Jackson & Associates, and
7 I'm going to give you their business card
8 here in a moment, on Friday or any day
9 next week or the week after, if you would
10 like the opportunity to read your
11 transcript and make any corrections that
12 you deem necessary on an errata sheet.

13 You do not have to do that but it
14 is certainly something that you're welcome
15 to do if you so chose. If you so chose to
16 read your transcript, you will need to
17 call Johnny Jackson & Associates sometime
18 Friday or next week and schedule an
19 appointment, where you will go into their
20 office and they'll put you in a conference
21 room so you have privacy and you will have
22 the opportunity to read the transcript and
23 make any corrections necessary on an
24 errata sheet and give that back to them,

1 which would be appended to the original
2 transcript. You will not be permitted to
3 take a copy of the transcript with you
4 then, okay.

5 I'd also like to just let you
6 know that if, for any reason whatsoever,
7 you want to take a break during this
8 interview, just say so and we'll take a
9 break, okay. We request that you not
10 discuss the interview with other people
11 after you leave today, other than
12 discussions with your attorney. That's
13 certainly fine. But we ask that you not
14 discuss your interview with other people,
15 just to protect the integrity of the
16 investigation and the interview process.

17 Mr. Baxter, I think, would like
18 to identify a document that he's given you
19 at this point in time, and he's welcome to
20 do so.

21 MR. BAXTER: Yes; I gave you a
22 letter discussing this interview. Do you
23 have any questions about that?

24 MR. THADISINA: No.

1 MR. BAXTER: You will see at the
2 bottom, after the interview, if you think
3 of any additional information you'd like
4 to share with us, you or, in this case,
5 your attorney, you may contact MSHA.
6 Norman Page is the contact for MSHA and
7 his contact information is at the bottom
8 of that letter.

9 MR. THADISINA: Okay.

10 MR. KOERBER: And on behalf of
11 the Office of Miners' Health, Safety and
12 Training, I'd like to inform you that West
13 Virginia Code 22A-1-22 is the statute
14 created to protect coal miners from
15 discrimination for participating in
16 interviews such as this. I'm going to
17 give you a memorandum which contains the
18 address of the West Virginia Board of
19 Appeals, which is the administrative body
20 that's charged with hearing discrimination
21 cases filed by miners, so this would be
22 where you would lodge your complaint if
23 you believe you have been discriminated
24 against for participating in this

1 interview. I would caution you that you
2 only have 30 days from the day of the
3 discriminatory act in which to file your
4 claim with the Board of Appeals, and this
5 is something that you may want to talk to
6 your attorney about after the interview is
7 over.

8 I'm also going to give you two
9 business cards, one of Mr. Terry Farley.
10 He is our lead interviewer for the Office
11 of Miners' Health, Safety and Training.
12 He is not here today but I'm going to give
13 you his business card as well as Mr. Bill
14 Tucker's business card. Mr. Bill Tucker
15 is the lead underground investigator for
16 the Office of Miners' Health, Safety and
17 Training, and should something come to
18 mind after you have left here today that
19 you would like to provide to the Office of
20 Miners' Health, Safety and Training, you
21 can contact either of these two people.
22 And I'm also going to give you the
23 business card of Johnny Jackson &
24 Associates, which is the court reporter

1 service that I just spoke about, which
2 contains the address and the telephone
3 number that you can call if you would like
4 to go in and read your transcript, okay.

5 MR. THADISINA: Okay.

6 MR. KOERBER: And at this point
7 in time, I'd ask that the court reporter
8 swear in the witness.

9 COURT REPORTER: Sir, would you
10 raise your right hand?

11 (WITNESS, RAGHUVVEER THADISINA,
12 SWORN.)

13 EXAMINATION

14 BY MR. KOERBER:

15 Q. Would you please state your name for the
16 record, and spell both your first and last name?

17 A. Okay, my name is Raghuvveer Reddy
18 Thadisina. First name is Raghuvveer, which is
19 R-A-G-H-U-V-E-E-R. Middle name is Reddy,
20 R-E-D-D-Y, and last name is Thadisina,
21 T-H-A-D-I-S-I-N-A.

22 Q. And would you please state your address
23 and telephone number?

24 A. Okay. (b) (7)(C)

1 (b) (7)(C) .

2 Q. And your telephone number?

3 A. My telephone number, my cell phone number
4 is (b) (7)(C)

5 Q. And do you have an attorney here with you
6 today?

7 A. Yes.

8 Q. And would your attorney please identify
9 himself and the firm he's with.

10 MR. WARNER: Brian Warner,
11 Shuman, McCuskey & Slicer.

12 Q. And is this gentleman your client?

13 MR. WARNER: Yes, sir.

14 Q. Sir, are you appearing here today as a
15 result of receiving a subpoena?

16 A. Yes.

17 Q. Okay. Would this be a copy of that
18 subpoena?

19 A. Yes.

20 Q. Okay. I'd ask that this be marked as
21 Exhibit 1.

22 (Thadisina Exhibit 1 marked.)

23 Q. Sir, the subpoena compels your appearance
24 on October 28th and I note that today is November

1 1st.

2 A. Yes.

3 Q. Based on some other events that were
4 occurring, we agreed to continue this till today at
5 3:00. Was that your understanding as well, sir?

6 A. Yes.

7 Q. Okay. I also notice that we have another
8 attorney in the room at the present time. I would
9 ask that he identify himself, the firm he's with
10 and the client he represents.

11 MR. AKERS: My name is Rob
12 Akers. I'm here on behalf of Massey and I
13 work with Allen, Guthrie & Thomas in
14 Charleston.

15 Q. And I note that there's other people in
16 the back of the room. I would ask that they
17 identify themselves.

18 MR. WATKINS: Tim Watkins with
19 MSHA.

20 MR. GODSEY: John Godsey, MSHA.

21 MR. PAGE: Norman Page, MSHA.

22 MR. PHILLIPSON: Sandin
23 Phillipson, MSHA.

24 MR. KOERBER: At this point in

1 time, I would ask Mr. O'Brien to begin the
2 interview.

3 MR. O'BRIEN: Okay. Thank you.

4 EXAMINATION

5 BY MR. O'BRIEN:

6 Q. Again, I'd like to thank you for coming in
7 and helping us out today. How many years of mining
8 experience do you have?

9 A. About this month, I got four years and six
10 months here; four years, six months.

11 Q. And who was that with?

12 A. It's only Massey, Massey Energy.

13 Q. Massey Energy?

14 A. Yes.

15 Q. Okay. Is this the only place you've ever
16 worked in the mine?

17 A. Yes.

18 Q. Do you hold any miner's certifications,
19 like any West Virginia miner's certifications?

20 A. Yes. I'm a red hat actually. That's the
21 only certification I have at this time.

22 Q. You're an apprentice miner?

23 A. Yes, apprentice miner.

24 Q. And you say you're currently employed with

1 **Massey?**

2 A. Yes.

3 Q. Okay. Is that Massey Coal Services or --

4 A. Currently I'm working at Independence
5 Coal, subsidiary of Massey Energy.

6 Q. Independence?

7 A. Yes.

8 Q. What is your job there?

9 A. I'm a mine engineer at Independence Coal.

10 Q. Where is your duty station, where do you
11 report?

12 A. Independence Coal.

13 Q. And where is that office?

14 A. It's in Uneeta.

15 Q. Would you give us a brief description of
16 your current job duties?

17 A. I'm a mine engineer and I work on
18 ventilation plans, ventilation revisions, prepare
19 end of month production reports and mid month
20 production reports, work on budget timing, budget
21 planning, and basically that's all.

22 Q. Okay. And who is your supervisor?

23 A. Randall Sheets.

24 Q. You say you do ventilation plans as part

1 of your job. Is that strictly for Independence or
2 all of Massey?

3 A. That's strictly for Independence.

4 Q. Have you performed any ventilation plans
5 or done any other plans for UBB?

6 A. No.

7 Q. Have you done any kind of work for or at
8 UBB?

9 A. At UBB. Well, in 2008, I was underground
10 at UBB. I'm involved to get some pressure and flow
11 readings. That's the only time when I was there,
12 back in, I guess, January of 2008.

13 Q. And that's the only time you've done any
14 work for UBB, not necessarily being in the mines
15 but any engineering work?

16 A. Yes, that's all.

17 Q. Have you done any -- and I may be
18 repeating myself, and if I am, I apologize.

19 Have you done any consulting or helped the
20 UBB engineers with ventilation plans or drainage
21 plans or roof control plans?

22 A. No.

23 Q. Do you supervise any of the engineers at
24 UBB?

1 A. No.

2 Q. Do you supervise anyone?

3 A. No.

4 Q. Have you had any involvement at all with
5 UBB since April 5, 2010? Have you done any kind of
6 work?

7 A. No.

8 MR. O'BRIEN: Okay. Thank you.

9 I'll pass the witness.

10 EXAMINATION

11 BY MR. SHERER:

12 Q. Okay, Mr. Thadisina, I've got a few
13 questions for you. You say you're a mining
14 engineer?

15 A. Yes, sir.

16 Q. Do you have a degree?

17 A. Yes.

18 Q. Where was that from, please?

19 A. I have Bachelors Degree from India and a
20 Masters from University of Kentucky.

21 Q. Okay. Are you a PE or EIT?

22 A. I'm an EIT and recently I did PE. I'm EIT
23 right now.

24 Q. Okay, in West Virginia?

1 A. With EIT is with Michigan State.

2 Q. Okay.

3 A. And I took my PE with West Virginia.

4 Q. Okay. You say you worked on a survey,
5 ventilation survey at UBB in January of 2008. What
6 was the purpose for that survey?

7 A. Well, I'm one of the members who went
8 underground to get some pressure and flow readings,
9 to get data, and I do not know the purpose of it, I
10 just brought it for the mine.

11 Q. Okay. Who asked you to do that
12 ventilation survey at UBB?

13 A. Well, it is actually Dr. Waller, professor
14 of Kentucky is Dr. Andrew Waller.

15 Q. Uh-huh.

16 A. And he did some work for UBB back in that
17 time, so we got some numbers for him.

18 Q. Okay. So he was doing some ventilation
19 planning or consulting or modeling or something?

20 A. I do not know the reason of the survey but
21 I was the team to just get the numbers and give it
22 to him.

23 Q. Okay. Were there many people involved in
24 that particular survey?

1 A. Yes, there were, I guess, at least three
2 teams. I do not remember exactly, three or four,
3 but at least three teams, the mine superintendents,
4 mine foremen, and we split into our teams and went
5 to different areas of the mine and got the numbers.

6 Q. Okay.

7 A. And the professor is the one who said
8 where to get the numbers.

9 Q. Okay. Did you hear anything about the
10 results of that?

11 A. No, I do not know anything about it.

12 Q. Are you still in contact with Dr. Waller?

13 A. Well, yes, just to say "Hello" but nothing
14 about UBB.

15 Q. Do you know who he worked with at UBB, who
16 asked him to do that?

17 A. Oh, it was Chris Blanchard is the
18 President there at that time, and he's the one,
19 from my understanding.

20 Q. Okay. Are you paid hourly or are you
21 salary?

22 A. I'm a salary.

23 Q. Okay. Does Massey have any standard
24 procedures for ventilation planning that you're

1 aware of?

2 A. When you say standard, no; it goes from
3 mine to mine and it depends on the situation.

4 Q. Okay. Site specific?

5 A. Site specific.

6 Q. Does Massey use any standard like computer
7 models, to evaluate ventilation?

8 A. Well, there is no standard.

9 Q. Well, like Penn State model, V Net?

10 A. Well, we have V Net PC. We use it
11 sometimes. I mean, it's not a part of our vent
12 plan but we can use it whenever you want to see the
13 different scenarios.

14 Q. Okay. Sure. Do you know of anybody that
15 has done any ventilation modeling at UBB?

16 A. No, I do not.

17 Q. Okay. Are you familiar with the
18 organization known as Route 3 Engineering?

19 A. Can you repeat that for me?

20 Q. Are you familiar with the organization
21 known as Route 3 Engineering?

22 A. Organization, you mean engineers and all
23 that?

24 Q. Yes.

1 A. I know just a few people.

2 Q. Okay. Do you have any contact with Route
3 3 Engineering? Have you had any?

4 A. No. I just know their names.

5 Q. Okay. Were you aware of any ventilation
6 problems at UBB prior to the explosion?

7 A. No.

8 Q. Okay. Have you looked at anything at UBB
9 since the explosion?

10 A. No, I have never been there.

11 Q. Okay. Have you discussed the explosion at
12 Upper Big Branch with anyone?

13 A. With anybody?

14 Q. Yes.

15 A. Well, I know what others say but I never
16 discussed anything.

17 Q. Does Massey have any policy on the use of
18 equipment doors versus overcast?

19 A. I do not know.

20 Q. Do you see many equipment doors used
21 instead of overcast?

22 A. Are you talking about UBB or my mine?

23 Q. Anywhere in Massey.

24 A. No, I'm not sure.

1 Q. Did Dr. Waller bring anybody else from the
2 University of Kentucky to do that survey?

3 A. Yes.

4 Q. Who is that, please?

5 A. Well, Dr. Waller was not there on the day
6 of the survey, he was in his office, but he sent
7 lab supervisor Ed Thompson.

8 Q. Okay. Do you know of anybody else that's
9 been involved in either that survey or the
10 processing and analysis of that data?

11 A. Well, no, I do not.

12 MR. SHERER: Okay. Thank you.

13 EXAMINATION

14 BY MR. MCATEER:

15 Q. Mr. Thadisina, is that pretty close?

16 A. Yes, that's my last name, yes.

17 Q. Did I get it right, your name?

18 A. Yes, close.

19 Q. Thank you. Okay. Thank you for coming.
20 I missed some of your mentioning. What's your
21 education? What's your educational background?

22 A. I got a BS in mining and also MS in
23 mining.

24 Q. BS is from?

1 A. India.

2 Q. What's the school?

3 A. Called Kothagudem School of Mines.

4 Q. Can you spell that for us?

5 A. Can I write it?

6 Q. Sure, that would be perfect.

7 A. That way I can do it faster.

8 Q. You can give it to that young lady.

9 And then you have an MS?

10 A. In mining from University of Kentucky.

11 Q. When did you get that?

12 A. I graduated from 2006, December.

13 Q. And then what is your work experience?

14 A. I got four years of work experience.

15 Q. When did you start?

16 A. Well, I started with Massey in 2006,
17 April, that is before graduation, and then I went
18 in December and gave formal dissertation and got my
19 degree, so with April, 2006, it is 4 1/2 years.

20 Q. And where did you start?

21 A. At Massey and at Independence Coal.

22 Q. Okay. But you started at Independence?

23 A. Yes.

24 Q. Okay.

1 A. At the same place where I am right now.

2 Q. Have you ever worked anyplace else, any
3 other Massey operations?

4 A. No.

5 Q. Okay. But for the survey?

6 A. Only for that survey at UBB.

7 Q. Okay. Where is your office?

8 A. At Uneeta.

9 Q. At Uneeta at the mine?

10 A. Yes, it's close to the mine.

11 Q. Okay. What type of readings were you
12 taking during the survey?

13 A. Pressure and flow readings.

14 Q. Pressure?

15 A. Yes, altimeter readings and anemometer
16 readings.

17 Q. Was there a sheet of paper were you given
18 or how were you instructed?

19 A. Can you repeat that for me?

20 Q. How were you told what to do?

21 A. Oh, Dr. Waller sent a map with the lab
22 supervisor and he split us into four, three or four
23 groups, I'm not sure, and so we got the readings
24 where he asked us to get and sent the readings with

1 him at the end of the survey.

2 Q. Okay. That's with Mr. Ed Thompson?

3 A. Ed Thompson, yes.

4 Q. You say there were three or four teams.

5 How many members on each team?

6 A. At least two.

7 Q. Who was on your team?

8 A. I'm not sure. It was back in 2008 and I
9 don't remember the names because I'm not familiar
10 with those guys.

11 Q. Sure. Was it somebody from UBB?

12 A. Yes, from UBB mine guys, foreman or
13 superintendent.

14 Q. Have you ever seen the results of the UBB
15 survey?

16 A. No.

17 Q. And have you ever discussed it with
18 Mr. Waller?

19 A. No.

20 Q. With Ed Thompson?

21 A. No.

22 Q. Okay. During the time you were there at
23 UBB, did you discuss the ventilation system? Did
24 you talk about that at all?

1 A. No.

2 Q. Did anyone give you a presentation before
3 you went in, like --

4 A. No.

5 Q. -- the president or anybody?

6 A. No.

7 Q. Who do you know at Route 3 Engineering?

8 A. Well, I mean, I know the names of the
9 engineers but Ed Thompson, I mean, I went to meet
10 Ed Thompson at the mine and we went underground.

11 Q. Okay.

12 A. It was George Leewall, he's a mine
13 engineer for that mine, but he's no more right, now
14 at this time.

15 Q. Okay. He was --

16 A. Mine engineer.

17 Q. Mine engineer for the mine?

18 A. Yes.

19 Q. And was he with Route 3?

20 A. Yes, he's with that group, and he did not
21 come with us underground.

22 Q. Okay. And do you have any experience with
23 the ventilation? When you went underground for the
24 survey, was anybody describing the ventilation

1 system to you?

2 A. No.

3 Q. At UBB.

4 A. No.

5 Q. How long did the survey take?

6 A. Two days.

7 Q. How many readings did you take or your
8 crew?

9 A. I don't remember.

10 Q. Ten or a thousand?

11 A. No, it's like I'd say 20 per day. I'd say
12 40, less than 40.

13 Q. Okay. And how did you record those?

14 A. On a paper.

15 Q. Okay. And did that paper, what happened
16 to that paper?

17 A. At the end of the survey, all the teams
18 gave the data to Ed Thompson and he took it to
19 Dr. Waller.

20 Q. Okay.

21 A. Professor.

22 Q. Did you have Dr. Waller in class when you
23 were in Kentucky?

24 A. Yes. He was my academic advisor when I

1 was at UK.

2 MR. MCATEER: Okay. Okay.

3 That's all the questions I have.

4 EXAMINATION

5 BY MR. O'BRIEN:

6 Q. Do you know of any other ventilation
7 surveys being performed at any other Massey mine?

8 A. I performed at my mine, Justice Number 1
9 mine.

10 Q. Which mine was that?

11 A. Justice Number 1 mine.

12 Q. And who requested that survey?

13 A. Nobody. It's me and my boss, let's say.

14 We want to see how it goes.

15 Q. Was Dr. Waller involved in that one?

16 A. No.

17 MR. O'BRIEN: All right. Thank
18 you.

19 EXAMINATION

20 BY MR. MCATEER:

21 Q. When was that survey?

22 A. I guess November, 2008.

23 Q. And Justice Number 1 is Independence?

24 A. Yes. Yes, I'm a mine engineer for that

1 mine.

2 Q. Right. And what did you do with your
3 survey?

4 A. I made the model in my mine, in my office.

5 Q. In a computer?

6 A. Yes.

7 Q. What program did you use?

8 A. V Net PC 2000.

9 Q. Is that the one that was being used at
10 Upper Big Branch or do you know?

11 A. I do not know what Dr. Waller used.

12 Q. Okay.

13 A. But when I was in school, that it was the
14 one he had.

15 Q. This is the one?

16 A. He had, yes.

17 MR. MCATEER: Okay. That's all
18 the questions.

19 MR. KOERBER: Sir, we have
20 interviewed over 250 people and we tell
21 everybody that at the end of all the
22 interviews, there may be a need to recall
23 certain individuals.

24 MR. THADISINA: Okay.

1 MR. KOERBER: And whether that
2 would be you or not, I have no idea, but I
3 just want you to be aware that that is a
4 possibility.

5 MR. THADISINA: Okay.

6 MR. KOERBER: And second,
7 everybody has been asking you questions.
8 If you have anything that you would like
9 to add, if there's anything information
10 that you believe the investigation teams
11 need that nobody asked a question to
12 elicit that information from you, if you'd
13 just like to make a statement, if you
14 would like to clarify anything that you
15 said earlier, the floor is yours. You can
16 make whatever statement you would like to
17 make.

18 MR. THADISINA: No, I don't have
19 any questions.

20 MR. KOERBER: We'll go off the
21 record.

22 (Interview concluded at
23 3:28 p.m.)
24

1 STATE OF WEST VIRGINIA, To-wit:

2 I, Lynne Rodriguez, a Notary Public and
3 Registered Professional Reporter within and for the
4 State aforesaid, duly commissioned and qualified,
5 do hereby certify that the deposition of was duly
6 taken by me and before me at the time and place
7 specified in the caption hereof.

8 I do further certify that said proceedings
9 were correctly taken by me in stenotype notes, that
10 the same were accurately transcribed out in full
11 and true record of the testimony given by said
12 witness.

13 I further certify that I am neither attorney
14 or counsel for, nor related to or employed by, any
15 of the parties to the action in which these
16 proceedings were had, and further I am not a
17 relative or employee of any attorney or counsel
18 employed by the parties hereto or financially
19 interested in the action.

20 My commission expires the 2nd day of June,
21 2020.

22 Given under my hand and seal this 2nd day of
23 November, 2010.

24

Lynne M. Rodriguez, RPR
Notary Public