

DEPOSITION SUMMARY OF ANGELA ROBBINS

Taken February 28, 2005
Robbins v. EIC Corp.
22222.222

The following is a summary of the deposition testimony of Angela Robbins taken on February 28, 2005. This summary reflects only the position taken by the witness during the deposition and in no way represents a concession by Jones Lawfirm. or its clients that the testimony, factual matters or matters of opinion reflected herein are accurate.

Page/Line Testimony

Examination by Cindy Smith (represents EIC Corp.): *(via telephone)*

Page 4 Line 1-13 Ms. Smith states that due to circumstances beyond her control co-counsel will take the deposition.

Page 4 Line 14-15 The witness is sworn in.

Page 4 Line 16-20 The witness states her full name as Angela Robbins.

Page 4 Line 21
Through
Page 5 Line 13 All attorneys agree that the deposition is taken pursuant to the Texas Rules of Civil Procedure; one objection by any defendant present is good for all defendants present. Thirty days to read and sign but an unsigned copy "would work" for any hearing or trial. Also an objection is placed regarding the subpoena deuces tecum that is attached to the notice, because it did not provide sufficient amount of time to provide the documents and it requests documents that have already been requested in other discovery.

Examination by Johnny Depp (represents Aim High, Inc.):

Page 5 Line 14
Through
Page 6 Line 10 Ms. Robbins's Social Security number is 444-44-4444, her date of birth is 8-15-1980 and she is the daughter of Bert Robbins. She has one sister, Eva Roberts. Ms. Robbins currently resides at 555 Nottinghill in Fort Worth, Texas where she has lived for eight years.

Page 6 Line 11-17 Her father passed away on August 9th, 2002. He was living in Renner, Texas at the time.

Page 6 Line 18
Through
Page 8 Line 9 She first noticed that her father was having health problems when he became sick in 1999. She does not recall what the doctor diagnosed him with. She stated that her father continued to go to different doctors after the first visit back in 1999. The doctors diagnosed him with lung cancer. When her father passed away his cause of death was listed as mesothelioma. She does not know when he was diagnosed with mesothelioma. Ms. Robbins stated that her father underwent radiation and chemotherapy treatments, but she does not recall how long either

one of the treatments took.

Page 8 Line 10
Through
Page 9 Line 5

When Ms. Robbins's father first became ill in 1999 he was retired. He retired from the Smithfield facility at Renner, where he worked for 45 years. She does not recall what type of trade or craft he did while at Smithfield. She stated that he never had any other employment other than Smithfield.

Page 9 Line 6
Through
Page 10 Line 1

She does not know of any products that her father may have worked around at Smithfield that contained asbestos nor did her father discuss with her any products that he worked around that might have contained asbestos. Her father retired from Smithfield in the mid 1990's.

Page 10 Line 2-11

Ms. Robbins lived with her parents until she was 18 years old. She never went out to the plant with her father nor did Smithfield ever have a family day where she went out to the plant.

Page 10 Line 12-14

She does not know if her father incurred any medical expenses due to his illness.

Page 10 Line 15-24

Her father had a will when he died, which was probated. It named her mother as the sole beneficiary.

Page 10 Line 25
Through
Page 11 Line 2

After her father passed away she did not seek any "psychiatric or counseling".

Page 11 Line 3-6

She does not know of any other place that her father might have worked besides Smithfield.

Page 11 Line 7
Through
Page 12 Line 1

She stated that her father's health prior to his illness in 1999 was "good"; however he did suffer from colon cancer prior to the mesothelioma. Her father had chemotherapy for the colon cancer, and the colon cancer went into remission.

Page 12 Line 2-17

Ms. Robbins stated that her father was a nonsmoker.

Examination by Cindy Smith (represents EIC Corp.):

Page 12 Line 18
Through
Page 13 Line 1
Page 13 Line 2-8

Ms. Robbins's father was in the hospital when he passed away, and he never spent any time in hospice care.

Her father's primary caregiver was Ms. Robbins' mother. Her mother took him back and forth to doctor's appointments after his diagnosis. Ms. Robbins never took her father to any of his doctors' appointments after his diagnosis.

Page 13 Line 9-12 She was 18 when she left home.

Page 13 Line 13-23 At the time of her father's death she was not financially dependent on him nor was he financially dependant on her.

Page 13, line 18-23 Ms. Robbins is married. Her husband never worked with her father and she has no grown children.

END OF SUMMARY