

EXHIBIT  
Osdene 1 Jd  
10/2/84 RM

**PORZIO, BROMBERG & NEWMAN**  
A PROFESSIONAL CORPORATION  
163 MADISON AVENUE  
MORRISTOWN, N. J. 07960  
(201) 538-4006  
ATTORNEYS FOR Plaintiffs

----- x  
ROSE D. CIPOLLONE and : UNITED STATES DISTRICT COURT  
ANTONIO CIPOLLONE, her : FOR THE DISTRICT OF NEW JERSEY  
husband, : HONORABLE H. LEE SAROKIN  
  
Plaintiffs, : Civil Action No. 83-2864 SA

vs. :  
NOTICE TO TAKE DEPOSITION

LIGGETT GROUP, INC., A :  
Delaware Corporation, PHILIP :  
MORRIS, INCORPORATED, A :  
Virginia Corporation, :  
LOEWS CORPORATION, a Delaware :  
Corporation, and LOEWS' :  
THEATRES, INC., a New York :  
Corporation, :  
  
Defendants. :  
----- x

TO: MICHAEL J. VASSALOTTI, ESQUIRE  
Brown, Connery, Kulp, Wille, Purnell & Greene, Esqs.  
518 Market Street  
Camden, New Jersey  
Attorneys for defendant, PHILIP MORRIS INCORPORATED

SIRS:

PLEASE TAKE NOTICE that commencing on March 20, 1984, at 10:00 A.M. at the law offices of PORZIO, BROMBERG & NEWMAN, P.C., 163 Madison Avenue, Morristown, New Jersey, the plaintiffs will take the deposition upon oral examination of Philip Morris Incorporated pursuant to Fed. R. Civ. P. 30(b)(6) before a notary public or duly authorized officer, authorized to administer oaths. Philip Morris Incorporated shall designate one or more officers, agents or other persons who are the most knowledgeable of and who can testify on its behalf as to the following matters:

A. The sale, marketing and advertising of Virginia Slims Cigarettes during the years of 1968 to 1972.

B. The sale, marketing and advertising of Parliament Cigarettes during the years of 1970 to 1974.

C. Research performed by or for Philip Morris Incorporated with respect to cigarette smoking and lung cancer.

D. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal relationship between cigarette smoking and lung cancer during the years of 1900 to 1910.

E. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal

relationship between cigarette smoking and lung cancer during the years of 1910 to 1920.

F. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal relationship between cigarette smoking and lung cancer during the years of 1920 to 1930.

G. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal relationship between cigarette smoking and lung cancer during the years of 1930 to 1940.

H. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal relationship between cigarette smoking and lung cancer during the years of 1940 to 1950.

I. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal relationship between cigarette smoking and lung cancer during the years of 1950 to 1960.

J. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal relationship between cigarette smoking and lung cancer during the years of 1960 to 1970.

K. Philip Morris Incorporated's knowledge of the medical and scientific literature suggesting a causal

relationship between cigarette smoking and lung cancer during the years of 1970 to 1981.

L. The names of any and all persons who acted as representatives, delegates or members for Philip Morris Incorporated to The Tobacco Institute.

M. The names and addresses of any and all advertising and marketing concerns employed by Philip Morris Incorporated with respect to Virginia Slims cigarettes during the years of 1966 to 1972.

N. The names and addresses of any and all advertising and marketing concerns employed by Philip Morris Incorporated with respect to Parliament cigarettes during the years of 1966 to 1972.

O. The names and addresses of any and all advertising and marketing concerns employed by Philip Morris Incorporated with respect to any cigarettes which it sold during the years of 1942 to 1981.

P. The present location of any and all minutes of the Board of Directors of Philip Morris Incorporated during which discussions were had concerning cigarette smoking and lung cancer.

Q. The location and the names and addresses of any and all persons responsible for the supervision of any and all

research laboratories or research divisions of Philip Morris Incorporated which were concerned in any way with the adverse health consequences of cigarette smoking.

PLEASE TAKE FURTHER NOTICE that the deposition will continue from day to day until completed. You are invited to attend and cross-examine.

PORZIO, BROMBERG & NEWMAN, P.C.  
Attorneys for Plaintiffs,  
Rose D. Cipollone and  
Antonio Cipollone

By

  
MARC T. EDELL

Dated:

Alan M. Darnell, Esq.  
Wilentz, Goldman & Spitzer,

Of Counsel

David J. Novack, Esq.  
Budd, Lerner, Kent, Gross,  
Picillo & Rosenbaum,

Of Counsel

EXHIBIT  
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10/28/84 RM

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