IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

U.S. PHILIPS CORPORATION, Plaintiff, v. EASTMAN KODAK COMPANY, Defendant.	)	Civil Action No. 06-251-GMS

PLAINTIFF U.S. PHILIPS CORPORATION'S OBJECTIONS TO DEFENDANT EASTMAN KODAK COMPANY'S NOTICE OF DEPOSITION OF GREGORY GADSON

Plaintiff U.S. Philips Corporation ("Philips"), by its attorneys, hereby objects to Defendant Eastman Kodak Company's ("Kodak") Notice of Deposition of Gregory Gadson.

OBJECTIONS TO NOTICE OF DEPOSITION

1. Philips objects to the time and location of the deposition. Philips does not have control over Gregory Gadson. The last known address that Philips has for Mr. Gadson is 19375 Amber Way, Noblesville, IN 46060.

2. Philips objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases.

3. Philips objects to the extent that this deposition in combination with depositions of other witnesses would cause Kodak to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

4. Philips objects to the extent that this deposition seeks information that is protected by claims of attorney-client privilege or attorney work product or any other applicable privilege or immunity.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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