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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

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NETSCAPE COMMUNICATIONS
CORPORATION, et al.,

Plaintiffs, Case No. C-06-00198
JW (PVT)

-against-

FEDERAL INSURANCE COMPANY,
et al.,

Defendants.

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September 8, 2006
1:05 p.m.

Deposition of JANICE CORBETIS, taken by
Defendants, pursuant to Notice, at the offices of
Duval & Stachenfeld, LLP, 300 East 42nd Street, New
York, New York, before Nancy R. Sullivan, a
Shorthand Reporter and Notary Public.

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A p p e a r a n c e s :

ABELSON HERRON LLP

Attorneys for Plaintiffs

333 South Grand Avenue

Suite 650

Los Angeles, California 90071

BY: MICHAEL BRUCE ABELSON, ESQ.

GORDON & REES LLP

Attorneys for Defendant St. Paul

Mercury Insurance Company

275 Battery Street, 20th Floor

San Francisco, California 94111

BY: SARA M. THORPE, ESQ.

Also Present:

THOMAS KEIGHLEY, Videographer

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IT IS HEREBY STIPULATED AND AGREED
by and between the attorneys for the
respective parties hereto that the sealing
and filing of the within deposition be, and
the same hereby are, waived; and that the
transcript may be signed before any Notary
Public with the same force and effect as if
signed before the Court.

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to the form
of the question, shall be reserved to the
time of trial.

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THE VIDEOGRAPHER: We are going on the record. Today's date is September 8, 2006. The time is approximately 1:05 p.m. This begins the videotaped deposition of Janice Corbetis in the matter of Netscape Communications Corp, et al. as plaintiffs versus Federal Insurance Company, et al. as defendants. This is under the jurisdiction of United States District Court for the Northern District of California, San Jose Division. The deposition is being held at the offices of Duval & Stachenfeld, which is 300 East 42nd Street New York, New York. My name is Thomas Keighley, the videographer of Veritext, New York. I would like to ask counsel to state their appearance for the record.

MR. ABELSON: This is Michael Abelson. I am counsel for plaintiffs.

MS. THORPE: Sara Thorpe, Gordon & Rees, on behalf of St. Paul Mercury Insurance Company.

THE VIDEOGRAPHER: I would like to

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ask the court reporter, Nancy Sullivan,
to please swear in the witness.

J A N I C E C O R B E T I S,
residing at 36 Mystic Circle, Bayshore,
New York 11706 having been first duly sworn by
the Notary Public (Nancy R. Sullivan), was
examined and testified as follows:

EXAMINATION

BY MR. ABELSON:

Q. Good afternoon, Ms. Corbetis.

A. Hi.

Q. Miss, Mrs. Ms.?

A. Whatever.

Q. Would you state and spell your name
for the record.

A. Yes, Janice, J-a-n-i-c-e, Corbetis
C-o-r-b-e-t-i-s.

Q. Where are you currently employed?

A. With the Travelers Insurance
Company in Jericho, New York.

Q. And does the Travelers Insurance
Company have some connection to the St. Paul
Company?

A. We merged a little over two years

Corbetis

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Q. And Ms. Thorpe and I have been each instructing our respective witnesses to give us time to actually to object, so you might want to take maybe half a beat between the end of my question and your answer, and it will give Ms. Thorpe an opportunity to determine how bad my question is before you answer, or good, although she's yet to compliment.

You were employed by St. Paul in the 1999/2000 time period?

A. Yes.

Q. And what was your job title at that time?

A. I believe it was regional underwriting director.

Q. And did -- what were your responsibilities as regional underwriting director?

A. My responsibilities were strategic in nature. It was a new model where we had local managing directors, and that's the role Angie Adams had which was much more geared towards sales and technical.

Q. Ms. Adams was more geared towards

Corbetis

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I correct that this is one of the e-mails that Ms. Thorpe sent to you in connection with your preparation for your deposition?

A. Yes.

Q. And am I also correct that from a paper perspective, that's the only piece of paper that you ever dealt with that reflected that AOL was an insured of St. Paul other than perhaps a report that crossed your desk saying the coverage had been bound?

A. This is the only document.

Q. This is the only document?

A. Yes.

Q. Why don't you just take a moment to read it over.

What do you recognize Exhibit 69 to be?

A. What do I recognize it to be?

Q. What does it reflect?

A. It looks like it reflects a lot of back and forth on what intent was meant.

Q. Let me try a different question. Let's actually break it down. I don't mean to make this too hard.

Corbetis

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2 First of all, does your handwriting
3 appear anywhere on this document?

4 A. Yes.

5 Q. Why don't you identify it.

6 A. Excuse me.

7 Q. Why don't you identify your
8 handwriting.

9 A. I have signed off on the page that
10 describes online activities.

11 Q. What did you write?

12 A. "Okay to endorse. This was the
13 intent." My name and the date.

14 Q. That's "J. Corbetis 9/22/00"?

15 A. Right.

16 Q. And without belaboring the point
17 how is it that you came to write those words,
18 what transpired that caused you to write those
19 words on this document?

20 A. I believe at the time I had
21 authority to approve manuscript endorsements,
22 and if I recall correctly, Angie Adams had left
23 the company and I was the acting managing
24 director.

25 Q. Let me back up further.