

COMPOSITE EXHIBIT “C”

4/22/2005 Tolt - Ruble, Raymond J. [SABW]

IN THE DISTRICT COURT
HARRIS COUNTY, TEXAS
333rd JUDICIAL DISTRICT

-----X

TOLT VENTURES, L.L.C., et al.,

Plaintiffs,

vs. No. 2003-69957

KPMG, L.L.P., et al.,

Defendants.

-----X

VIDEOTAPED DEPOSITION OF

RAYMOND JOHN RUBLE

New York, New York

Friday, April 22, 2005

Reported by:

WENDY D. BOSKIND, RPR

JOB NO. 171566

7/20/2007 11:13 AM

1

CONFIDENTIAL

M0642818
SA-GAIN3278

4/22/2005 Tolt - Ruble, Raymond J. [SABW]

1 Ruble
2 have you had a deposition taken with
3 regard to any BLIPS, that is, bond link
4 insurance premium strategy case or Opus
5 case?

6 MR. SOMMER: Objection, form.

7 A. I decline to testify pursuant to
8 my right not to be a witness against
9 myself under the Fifth Amendment to the
10 United States Constitution.

11 Q. Do you have a transcript of any
12 such deposition?

13 A. I decline to testify pursuant to
14 my right not to be a witness against
15 myself under the Fifth Amendment to the
16 United States Constitution.

17 Q. Have you had any discussions
18 with counsel for either KPMG or Sidley
19 Austin Brown & Wood regarding any case
20 involving the bond link insurance -- or,
21 bond link investment premium strategy?

22 MR. ABRAMS: For the record, I
23 think it's Mr. Ruble's intention to
24 repeat the same answer that he has
25 given with respect to virtually all

6/22/2005 Eacho/Gaslow - Ruble, Raymond John [SABW]

1 SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
2 CIVIL DIVISION

3 -----x

4 WILLIAM C. EACHO, III and DONNA EACHO,
Plaintiffs,

5 Civil Action No.
-against- 04-005746

6
7 KPMG, LLP, SIDLEY AUSTIN BROWN & WOOD
and PRESIDIO ADVISORS LLC,
Defendants.

8 -----x

9 SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

10 -----x

11 LAWRENCE L. GASLOW
Plaintiff,

12 Civil Action No.
-against- 60771/04

13 KPMG LLP, QA INVESTMENTS LLC., and
SIDLEY AUSTIN BROWN & WOOD LLP
Defendants.

14 -----x

15 June 22, 2005
16 1:42 p.m.

17 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

18

19 Videotaped Deposition of RAYMOND J. RUBLE,
taken by Plaintiff, pursuant to Subpoena, at the
20 offices of King & Spalding, 1185 Avenue of the
Americas, New York, New York, before William
21 Visconti, a Shorthand Reporter and Notary Public
within and for the State of New York.

22

6/22/2005 Eacho/Gaslow - Ruble, Raymond John [SABW]

1 Q. And your education?

2 A. I have a my highest degree is a
3 masters in tax in NYU. I have my law degree from
4 NYU and bachelors from the University of the
5 North Carolina.

6 Q. From approximately 1993 until 2003,
7 were you employed by Brown & Wood, Sidley Austin
8 Brown & Wood LLP?

9 A. On advice of counsel, I decline to
10 testify pursuant to my rights under the Fifth
11 Amendment of the United States Constitution.

12 Q. During that time, you worked for
13 Brown & Wood, did you work in tax?

14 A. On advice of counsel I decline to
15 testify pursuant to my rights under the Fifth
16 Amendment of the United States Constitution.

17 Q. And during the years from 1997 and
18 1998 and 1999 and beyond, at least with respect
19 to those years, you were a tax partner for
20 Brown & Wood; isn't that correct?

21 MR. RUFFINO: Objection, foundation
22 vague.

8/23/2006 Schneider - Ruble, Raymond [SABW]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE CIRCUIT OF THE
NINTH JUDICIAL CIRCUIT, IN
AND FOR ORANGE COUNTY,
FLORIDA

CASE NO.: C10-02-0003106

-----X
DIANE SCHNEIDER and SCHNEIDER INTERESTS, L.P., a
foreign limited partnership,

Plaintiffs,

vs.

KPMG, L.L.P., f/k/a KPMG PEAT MARWICK, L.L.P., a
foreign limited liability partnership, and
SIDNEY, AUSTIN, BROWN & WOOD, L.L.P.,

Defendants.
-----X

102 Third Street
Mineola, New York
August 23, 2006
9:55 a.m.

TELEPHONIC DEPOSITION OF RAYMOND
RUBLE, the non-party witness herein, taken by
Plaintiffs, held at the above-noted time and
place, pursuant to Subpoena, before a Notary
Public in and for the State of New York.

5/1/2007 7:22 AM

1

M0638086

8/23/2006 Schneider - Ruble, Raymond [SABW]

1 R. Ruble

2 for the record.

3 A Raymond Ruble.

4 Q And your address?

5 A 1517 Avalon Square, Glen Cove, New
6 York.

7 Q All right, sir. Are you a licensed
8 attorney in the state of Florida or in the state
9 of New York?

10 A I decline to testify pursuant to my
11 rights under the Fifth Amendment to the United
12 States Constitution.

13 Q Sir, were you previously a partner of
14 Brown and Wood?

15 A I decline to testify pursuant to my
16 rights under the Fifth Amendment to the United
17 States Constitution.

18 Q Mr. Ruble, were you a partner at Brown
19 and Wood in 1996?

20 A I decline to testify pursuant to my
21 rights under the Fifth Amendment to the United
22 States Constitution.

23 MR. ABRAMS: In the interest of moving
24 it along, do you have any objection if
25 Mr. Ruble just says "same answer"?

5/1/2007 7:22 AM

5

M0638090

5/10/2005 Martin - Ruble, Raymond John Vol 2 [SABW]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE DISTRICT COURT OF
HARRIS COUNTY, TEXAS
113TH JUDICIAL DISTRICT

----- X
J. DAVID MARTIN, MICHAEL COVARRUBIAS,
and CATHY GREENWOLD,

Plaintiff,

vs

JENKENS & GILCHRIST, a Texas professional
Corporation, JENKENS & GILCHRIST, an
Illinois Corporation, PAUL M. DAUGERDAS,
SIDLEY AUSTIN BROWN & WOOD, L.L.P.,
R.J. RUBLE, DEUTSCHE BANK AG and DEUTSCHE
BANK SECURITIES, d/b/a/ DEUTSCHE BANK ALEX BROW

Defendants.

----- X
DEPOSITION OF RAYMOND JOHN RUBLE
VOLUME 2
New York, New York
May 10, 2005

Reported by:
Hope Menaker

5/10/2005 Martin - Ruble, Raymond John Vol 2 [SABW]

1

2 of those individuals in connection with that
3 transaction, the COBRA transaction; is that
4 correct?

5 A. On advice of counsel, I decline to
6 testify pursuant to my right under the Fifth
7 Amendment of the United States Constitution.

8 MS. DUCKERS: Can I have this marked.

9 (Whereupon the described document was
10 marked as Exhibit 1.)

11 Q. I'm handing you --

12 MR. ABRAMS: Just I'd like to note on
13 the record that as Mr. Ruble indicated, he
14 is, on advice of counsel, asserting his Fifth
15 Amendment privilege.

16 I've advised your firm that it's his
17 intention to assert the privilege with
18 respect to all substantive questions during
19 this deposition and that position is based on
20 our current assessment of the risks of
21 self-incrimination and if that assessment
22 changes at any time, we'll notify your
23 office.

24 MS. DUCKERS: I appreciate that.

25 Q. Mr. Ruble, I'm handing you what's been