

EXHIBIT B

145

1 of the firm's retirement policy. It was not
2 within the jurisdictions of my job.

3 MS. HAMILTON: Could you mark this as White
4 Deposition Exhibit 14?

5 BY MS. HAMILTON:

6 Q. In 1999, what, if anything, have you
7 heard about what the firm's retirement policy was?

8 A. I didn't hear anything about the
9 retirement policy.

10 (WHEREUPON, a certain document was
11 marked White Deposition
12 Exhibit No. 14, for
13 identification, as of 7/26/06.)

14 BY MS. HAMILTON:

15 Q. Mr. White, I'm going to ask you to take
16 a look at what's been marked as White Exhibit No.
17 14, SA 30831. Is that your signature --

18 A. Yes.

19 Q. -- on the document?

20 Whose initials appear on the document?

21 A. Where? Over --

22 Q. The sort of middle to the --

23 A. WBW;kmr?

24 Q. Yes.

1 A. Those are my initials and my
2 secretary's initials.

3 Q. What was your secretary's name?

4 A. Karen Reber, R-e-b-e-r.

5 Q. Do you recall the circumstances that
6 led you to write this letter?

7 MR. CONWAY: Object to foundation.

8 BY THE WITNESS:

9 A. Yes.

10 BY MS. HAMILTON:

11 Q. What led you to write this letter?

12 MR. CONWAY: Object to foundation --

13 BY THE WITNESS:

14 A. This letter --

15 MR. CONWAY: -- and form.

16 BY THE WITNESS:

17 A. This letter was drafted by Mr. Delp,
18 who was then the current secretary of the
19 Executive Committee, and I was asked to sign it.

20 BY MS. HAMILTON:

21 Q. Who asked you to sign it?

22 A. Pardon?

23 Q. Who asked you to sign it?

24 A. Mr. Delp.

1 Q. What did Mr. Delp say to you when he
2 asked you to sign it?

3 A. He asked me to sign it so he could put
4 it in his file in case there was a problem with
5 his self-employment tax on his retirement
6 payments.

7 Q. At the time that you signed it, were
8 you aware that it was addressed to the Social
9 Security Administration?

10 A. Yes.

11 Q. At the time that you signed it, did you
12 believe it to be a correct statement of policy?

13 A. I had no reason to believe it wasn't.

14 Q. But did you believe it to be correct?

15 A. Yes.

16 Q. At some later point in time, did you
17 develop the view that it was not correct?

18 A. Based on, yeah, what I read in the
19 newspaper, it's not correct.

20 Q. When you say what you read in the
21 newspaper, what are you referring to?

22 A. In terms of -- I'm referring to the
23 newspaper article in the Tribune relating to my
24 disqualification -- or to the disqualification of

1 my attorney because of the adverse situation with
2 Sidley's position.

3 Q. Okay.

4 A. At that point in time, you know, I
5 became aware of the fact that this was not the
6 policy.

7 Q. Or at least you became aware that
8 Sidley is now taking the position that is not the
9 policy of the firm, correct?

10 MR. CONWAY: Object to form. Go ahead and
11 answer.

12 BY THE WITNESS:

13 A. Yes.

14 BY MS. HAMILTON:

15 Q. Do you recall anything else that
16 Mr. Delp said to you when he asked you to sign the
17 letter?

18 A. No.

19 Q. Did Mr. Delp present the draft to you
20 for your signature?

21 A. I don't recall how it was given to me,
22 but --

23 Q. Do you know who actually wrote the
24 language contained in the letter?