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3 Q. Mr. Taylor, what did you do to prepare to come here  
4 today as the 30(b)(6) designee?

5 A. I reviewed the file history and the files of  
6 Baker & Daniels and Barnes & Thornburg.

7 Q. Did you talk to anybody at Heartland to gather  
8 information?

9 A. No, I did not speak personally with anyone at  
10 Heartland.

11 Q. You say speak personally. Did you speak indirectly  
12 to anyone at Heartland?

13 A. No, I didn't.

14 Q. Did you look at any of Heartland's records?

15 A. Just to the extent to which they were in the  
16 Baker & Daniels and the Barnes & Thornburg files.

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22 Q. I see. As part of your analysis, you also made  
23 certain credibility judgments, didn't you?

24 A. To a certain extent, yeah.

25 Q. And what techniques or methodology did you use to

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1 judge someone's credibility?

2 A. Um, the only issues that I saw there is where there  
3 was documents that clearly refuted the testimony.

4 Then, you know, I would make a determination that  
5 that's probably not accurate, because it's not  
6 supported by the documentary evidence.

7 Q. But you have no way of knowing if those documents  
8 were actually received by Heartland, because you  
9 didn't look at Heartland's records, did you?

10 A. I have no reason to know that they were not.

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1 Q. Yeah. And you didn't look to see if Heartland had a  
2 copy of that in their files, did you?

3 A. I have not seen a copy. All I've seen is  
4 Mr. Tuttle's testimony. That if it's there, it will  
5 be in Baker & Daniels or Barnes & Thornburg's files.

6 Q. It would also be in Heartland's files, don't you  
7 think?

8 A. If they still have their files.