

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Docket No.: **06 CA 11370 MLW**

Christine. Varad,
Plaintiff,
v.

Reed Elsevier Incorporated,
d.b.a. *LexisNexis, LexisNexis Risk &
Information Analytics Group, Inc.*,
Defendant.

**PLAINTIFF'S Fed. R. Civ. P. 30(e) WRITTEN STATEMENT
OF REVIEW DEPOSITION**

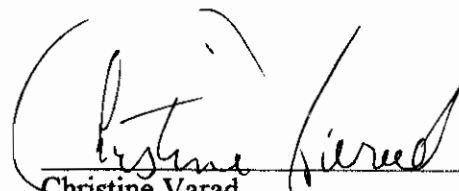
Plaintiff, Christine Varad, hereafter {"Varad"}, hereby makes written statement of review and signature of deposition transcript taken on Wednesday, April 18, 2007, by counsel representing defendant, Elsevier Incorporated, d.b.a. *LexisNexis, LexisNexis Risk & Information Analytics Group, Inc.*, hereafter {"Reed"}.

1. Plaintiff hereby certifies that she demonstrated to counsel for defendant, Elsevier Incorporated, d.b.a. *LexisNexis, LexisNexis Risk & Information Analytics Group, Inc.*, that she was unable, after exercise of due diligence, to obtain counsel to represent her at the time of the taking of the deposition and that she invoked any and all rights and protections pursuant to Fed. R. Civ. P. 32(a)(3).
2. Plaintiff attempted to contact by telephone, David Arsenault, Farmer, Arsenault, Brock, LLC and having no success reaching him, she contacted him by letter dated April 30, 2007, concerning review and signing of the deposition. See: Attached Exhibit A, Letter to David Arsenault. Varad hereby

invokes her right pursuant to Fed. R. Civ. P. 30 (e) to have the instant writing function as (1) her signed statement concerning reasons for changes and objections to such deposition, (2) her statement that review of the deposition was requested and (3) her signed request that this statement be appended to the record deposition document at all times pursuant to Fed. R. Civ. P. 30(e).

3. Varad states that the deposition was oppressive throughout for the reason that, without an attorney, Varad had no genuine ability to properly object to deposition improprieties concerning form and/or substance or to cross-examine the witness as permitted by the Federal Rules of Evidence and Fed. R. Civ. P. 30 (c).
4. Varad states that the deposition was harassing throughout for the reason that counsel for defendant, Elsevier Incorporated, d.b.a. *LexisNexis, LexisNexis Risk & Information Analytics Group, Inc.*, refused to recognize or acknowledge the Amended Complaint, insisting instead on exclusively questioning Varad concerning the original, Complaint which is replaced by filing the Amended Complaint.

May 7, 2007


Christine Varad
P.O. Box 583
Milton, Massachusetts 02186
781 583 7117

I certify that on this 7th day of May 2007, I caused a copy of PLAINTIFF'S Fed. R. Civ. P. 30(e) WRITTEN STATEMENT OF REVIEW DEPOSITION, to be served on the