

Exhibit E

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NATALIA HATGIS
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

PASHA S. ANWAR, et al.,
Plaintiffs,

Civil Action No.

vs.

09-CV-0118 (VM)

FAIRFIELD GREENWICH LIMITED, et al.,
Defendants.

-----x

VIDEOTAPED DEPOSITION OF NATALIA HATGIS
New York, New York
June 24, 2011

Reported by:

KATHY S. KLEPFER, RMR, RPR, CRR, CLR

JOB NO. 39620

1 **NATALIA HATGIS**
 2 **"The partnership commenced operations on May 1,**
 3 **2006." Do you see that?**
 4 A. Yes.
 5 **Q. This indicates that the Greenwich**
 6 **Sentry Partners Limited Partnership began on May**
 7 **1, 2006, right?**
 8 A. Uh-huh. Go ahead.
 9 **Q. Do you have a question?**
 10 A. No. No. You go.
 11 **Q. Okay. So there were no year-end**
 12 **financial statements for Greenwich Sentry**
 13 **Partners, the fund that you invested in, by the**
 14 **time that you decided to invest in September or**
 15 **October of 2006, right?**
 16 A. Well, not -- I don't know. Not for
 17 that year, no.
 18 MR. VICKERY: You're representing
 19 that, right?
 20 THE WITNESS: Not for 2006.
 21 BY MS. CRAWFORD:
 22 **Q. Right, because the fund just commenced**
 23 **in May, right?**
 24 A. Right.
 25 **Q. So the fund had only been in existence**
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1 **NATALIA HATGIS**
 2 **FGG's auditors and the manager, Bernard Madoff,**
 3 **was also audited." Do you see that?**
 4 A. No. Which one?
 5 **Q. The last sentence of --**
 6 A. Paragraph which one?
 7 **Q. -- the first full paragraph on the**
 8 **second page.**
 9 A. Yes. Okay. He told me that the
 10 Sentry Fund was audited by -- yes.
 11 **Q. So that doesn't indicate that**
 12 **PricewaterhouseCoopers was Sentry's auditors,**
 13 **right?**
 14 A. No, not here.
 15 **Q. And nothing that your husband said**
 16 **indicated that PricewaterhouseCoopers was the**
 17 **auditor, right?**
 18 A. I can't remember what everything my
 19 husband said, but it's certainly not in here.
 20 **Q. In any event, you only know that**
 21 **PricewaterhouseCoopers was an auditor for one or**
 22 **more Fairfield funds?**
 23 A. Yes.
 24 **Q. And you only knew that at the time**
 25 **that you made your decision to invest because**
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1 **NATALIA HATGIS**
 2 **for four or five, six months when you decided to**
 3 **invest, correct?**
 4 A. I don't know. I guess so.
 5 **Q. Now, you talked about how your**
 6 **husband's notes of his meeting with Philip Toub**
 7 **formed, I think you said, part of the big bowl**
 8 **of memories about the facts of your investment,**
 9 **right?**
 10 A. Yes.
 11 **Q. But those notes don't mention**
 12 **PricewaterhouseCoopers' name in them, do they?**
 13 A. The big bowl?
 14 MR. VICKERY: You better take a look
 15 at it.
 16 **Q. The notes. Why don't you take a look**
 17 **at Exhibit 3.**
 18 A. Exhibit 3?
 19 **Q. Yes.**
 20 A. Okay. What does he say here?
 21 **Q. On page 2.**
 22 A. On page 2.
 23 **Q. At the end of the first full**
 24 **paragraph, it says, "He," meaning Philip Toub,**
 25 **"Told me that the Sentry Fund was audited by**
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1 **NATALIA HATGIS**
 2 **there was the name PricewaterhouseCoopers in the**
 3 **Fairfield Greenwich marketing materials, right?**
 4 A. There was the name somewhere.
 5 **Q. You didn't rely on anything that**
 6 **PricewaterhouseCoopers (Canada) did in making**
 7 **the decision to invest, did you?**
 8 A. No, not that I recall.
 9 **Q. You didn't have any contact with**
 10 **anyone at PwC (Canada) before you invested?**
 11 A. No.
 12 **Q. And you didn't receive any materials**
 13 **from PwC (Canada) before you invested?**
 14 A. No, I did not.
 15 **Q. As you sit here today you don't recall**
 16 **receiving any audit reports for any of the**
 17 **Fairfield funds, right?**
 18 A. No.
 19 **Q. That's correct?**
 20 A. That's correct.
 21 **Q. Thanks. I think it's me, not you.**
 22 A. No, that's okay.
 23 **Q. Okay. Can you look at Exhibit 22,**
 24 **your declaration.**
 25 A. 22, yes.
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1
2 **Q. If you look at paragraph 4, you**
3 **stated, "In deciding to make and hold my**
4 **investment in the fund, my husband and I**
5 **reviewed and relied upon a variety of documents**
6 **provided by the Defendants, including a**
7 **prospectus. We also reviewed annual reports on**
8 **the Fund's performance and documents regarding**
9 **FGG's extensive due diligence and depth of**
10 **monitoring practices." Do you see that?**

11 A. Uh-huh.

12 **Q. Yes?**

13 A. Yes, I do. I'm sorry.

14 **Q. That's okay.**

15 **So, consistent with your answer to my**
16 **prior questions, you're not referring in**
17 **paragraph 4 to anything that**
18 **PricewaterhouseCoopers did in this paragraph,**
19 **right?**

20 A. I'm not referring specifically to
21 that, no --

22 **Q. Are you referring --**

23 A. -- to anything that
24 PricewaterhouseCoopers did. But you'd have to
25 ask my husband as well, because this is a "we."

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1
2 **Q. Did he tell you anything about what**
3 **price -- about what PricewaterhouseCoopers did**
4 **before you made the decision to invest?**

5 A. I can't remember.

6 **Q. As you sit here today, you don't**
7 **recall?**

8 A. No.

9 **Q. Can you please look at paragraph 9?**

10 A. 9?

11 **Q. Yes.**

12 A. Okay.

13 **Q. It says, "At all relevant times, I**
14 **relied upon Defendants' representation that the**
15 **fund was going to invest, and actually was**
16 **investing, my money in securities. The**
17 **Defendants had verified the existence of these**
18 **holdings and that the various financial**
19 **statements reflecting the value of these**
20 **holdings and the value of the Partnership were**
21 **accurate." Do you see that?**

22 A. Yes.

23 **Q. Are you referring there to anything**
24 **that PricewaterhouseCoopers (Canada) did?**

25 A. Not specifically that I can remember.

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NATALIA HATGIS

1
2 **Q. When you say "not specifically," what**
3 **do you mean?**

4 A. I mean I can't remember specifically
5 Pricewaterhouse providing me or Pricewaterhouse
6 (Canada) --

7 **Q. Or PricewaterhouseCoopers at all?**

8 A. Yes, giving me anything.

9 **Q. You don't remember them giving you**
10 **anything, right?**

11 A. No.

12 **Q. And you believe that the**
13 **representation -- representations regarding the**
14 **existence of the holdings in the Greenwich**
15 **Sentry Partners Fund I believe you testified**
16 **earlier came from Fairfield, right?**

17 A. That's right.

18 **Q. And you said -- I think you testified**
19 **earlier, "and the Greenwich people had the**
20 **Pricewaterhouse audits," do you remember saying**
21 **that?**

22 A. Yes.

23 **Q. But you didn't have the**
24 **Pricewaterhouse audits?**

25 A. No. No, I did not.

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NATALIA HATGIS

1
2 **Q. And you actually said -- you said,**
3 **"I'm not quite sure what they were auditing,"**
4 **right?**

5 A. Yes.

6 **Q. Do you actually know what**
7 **PricewaterhouseCoopers was auditing?**

8 A. I thought they were auditing the
9 actual securities, but I didn't quite -- no. I
10 mean, specifically, no.

11 **Q. You don't know?**

12 A. At that time, no.

13 **Q. Okay. And do you understand that --**
14 **you understand that PricewaterhouseCoopers**
15 **(Canada) did not audit Bernard Madoff, right?**

16 A. Yes.

17 **Q. I believe you said you looked at the**
18 **Pricewaterhouse review in making your**
19 **investment. Again, are you just referring to**
20 **the PricewaterhouseCoopers name generally?**

21 A. Yes.

22 **Q. You're not referring to any actual**
23 **documents, right?**

24 A. On Pricewaterhouse letterheads? No.

25 **Q. Could you look at Exhibit No. 21.**

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1 **NATALIA HATGIS**
 2 A. 21. Hold on.
 3 Yes. Yes.
 4 **Q. These are the materials that you**
 5 **requested and obtained from Lina Pava in April**
 6 **of 2009, correct?**
 7 A. Apparently, yes.
 8 **Q. Now, if you look at the bottom of**
 9 **page -- of Hatgis 510?**
 10 A. Yes.
 11 **Q. That begins the list of the materials**
 12 **you requested, right?**
 13 A. Yes.
 14 **Q. Okay. If you flip to the next page?**
 15 A. Yes.
 16 **Q. You see that letter C asks for the**
 17 **audited financial statements, auditors reports**
 18 **and management letters, do you see that?**
 19 A. Yes.
 20 **Q. Why did you ask for those?**
 21 A. I may have been advised by my lawyers
 22 to do so or I may not have. I'm not sure.
 23 **Q. Well, why --**
 24 A. Well, let's look at the timeline here
 25 because -- April '09. I was asked by my counsel
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1 **NATALIA HATGIS**
 2 to compile information. This may have been on
 3 their list, but I don't completely remember.
 4 **MR. VICKERY:** Let me instruct you
 5 don't go any further with respect to advice
 6 of counsel.
 7 **THE WITNESS:** Okay.
 8 **BY MS. CRAWFORD:**
 9 **Q. You didn't have a copy of the audited**
 10 **financial statements before you asked for them**
 11 **in April of 2009, right?**
 12 **MR. VICKERY:** Objection to form.
 13 A. I could not find that.
 14 **Q. You didn't have a copy of the**
 15 **auditor's reports or the management letters**
 16 **either, right?**
 17 A. I could not find any.
 18 **Q. Could you turn, same exhibit, but turn**
 19 **back to the last -- no, excuse me, to Hatgis**
 20 **611.**
 21 A. 611?
 22 **Q. Yes.**
 23 A. Yes.
 24 **Q. These are -- the first page here, 611,**
 25 **says that these are the Greenwich Sentry**
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1 **NATALIA HATGIS**
 2 **Partners, L.P. financial statements for the year**
 3 **ended December 31, 2007 and the period ended**
 4 **December 31, 2006. Do you see that?**
 5 A. Yes.
 6 **Q. Before you got this from Lina Pava,**
 7 **you didn't have a copy of this document,**
 8 **correct?**
 9 A. I don't remember. I really -- I
 10 cannot remember this far back.
 11 **Q. Does this document look familiar to**
 12 **you?**
 13 A. I cannot tell you whether it looks
 14 familiar. It just -- I don't remember.
 15 **Q. Why can't you tell me if it looks**
 16 **familiar?**
 17 A. Because nothing looks familiar to me
 18 at this point. I'm overwhelmed with papers. So
 19 I cannot tell you -- it does and it doesn't. I
 20 mean, all these documents look the same after a
 21 while.
 22 Your logo's on the first page, and I
 23 can't tell you whether that -- I can't -- I
 24 can't tell you with certainty whether I have
 25 seen this or not. I really can't. I can tell
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1 **NATALIA HATGIS**
 2 you that --
 3 **Q. If it doesn't, it doesn't. Is it fair**
 4 **to say it doesn't really look familiar to you,**
 5 **right?**
 6 A. Well, it's hard because I know your
 7 logo really well. Now, whether I know it from
 8 something I owned or something I saw on a
 9 billboard, I can't tell you.
 10 **Q. You don't remember reading this**
 11 **before?**
 12 A. No, I don't remember reading this.
 13 **Q. And if you look at Hatgis 613?**
 14 A. Yes.
 15 **Q. This isn't addressed to you, right?**
 16 A. No. It's to the --
 17 **Q. It doesn't have your name on it?**
 18 A. It doesn't have my personal name.
 19 **Q. It doesn't have your address on it?**
 20 A. No.
 21 **Q. As far as you know, PwC (Canada) never**
 22 **actually sent you any materials, correct?**
 23 A. All I can say with certainty is if I
 24 asked Lina for it, I didn't have it. That's
 25 what I can tell you.
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Q. Do you recall getting any materials in the mail from PricewaterhouseCoopers (Canada)?

A. I don't recall, but I don't -- I don't recall, basically.

Q. And you never had any contact with anyone from PwC (Canada).

A. No. No.

Q. You understand that you're suing PwC (Canada) in this lawsuit?

A. I believe you're involved, yes, I understand that.

Q. What do you contend that PwC (Canada) failed to do?

A. I am contending that the audits that you were giving Fairfield Greenwich and that they were giving us seemed to be inaccurate, and yet you were hired to give --

Q. And what's your --

A. -- legitimate audits.

Q. And what's your basis for that contention?

A. That there was -- there was no -- there was no money. You know, as a layperson, that's the only way I can explain it. So we're

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quoting money that actually didn't exist.

Q. And are you aware of any other auditors that discovered Madoff's Ponzi scheme before December 11, 2008?

A. I don't -- no. I mean, I'm not relating this to Madoff. I'm relating this to Greenwich.

Q. Tell me what you mean by that.

A. In other words, you're asking me whether, you know, why am I suing Greenwich Capital. I mean, I'm not quite sure what this has to do with Madoff. Do I know that other people were auditing Madoff? I guess so.

MR. VICKERY: I think all the allegations with respect to PWC are set forth in the Second Amended Complaint, and that's her -- she's part of the class.

MS. CRAWFORD: I'm entitled to ask my questions.

MR. VICKERY: You can ask the questions. I'm just telling you if you want the facts, the allegations are in the Second Amended Complaint.

BY MS. CRAWFORD:

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Q. What's the basis for your contention that PwC (Canada) should have discovered the Madoff Ponzi scheme?

A. If you were the auditing firm hired by these guys that I invested with to audit their books and their performance, I would have assumed that, as an auditor -- as auditors, you would have applied your skills to see if there was actually any money there. I mean, again, I can't get into a technical...

Q. You certainly have no auditing expertise, correct?

A. Oh, good Lord, no. I'm sorry.

Q. And you don't have any information that would support the notion that PwC (Canada) conducted its audits negligently or improperly, right?

A. No.

MR. VICKERY: We'll have lots of expert testimony on that.

THE WITNESS: Oh, I'd love to see this.

MS. CRAWFORD: Me, too.

I have no further questions.

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NATALIA HATGIS

THE WITNESS: Thank you.

EXAMINATION BY

MS. PIERCE:

Q. Last but not least.

A. Another one?

Q. Yes.

A. Aren't you patient.

Q. Ms. Hatgis, my name is Betsy Pierce and I'm associated with the firm of Hughes Hubbard & Reed. We represent PricewaterhouseCoopers (Netherlands) in this litigation, and I guess my first question for you is have you ever heard of PricewaterhouseCoopers (Netherlands)?

A. No.

Q. And you just answered questions from counsel for PricewaterhouseCoopers (Canada). Do you understand that there's a difference between the firm PricewaterhouseCoopers (Canada) and the firm PricewaterhouseCoopers (Netherlands)?

A. No, I do not.

Q. Do you just -- just in hearing that those two firms have two different countries attached to their names, what would that make

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NATALIA HATGIS

you think about those firms in terms of the difference between the two?

MR. VICKERY: Objection to form.

MS. PIERCE: Fair.

BY MS. PIERCE:

Q. Would you like me to try to rephrase that?

A. Yes.

Q. So if one country -- or, if one firm is called PricewaterhouseCoopers (Canada) and the other firm is called PricewaterhouseCoopers (Netherlands), just based on that, what do you think the difference is?

A. I would think that the Netherlands branch looked after the companies in the Netherlands and the Canada was handling companies based out of Canada.

Q. Okay. Prior to your decision to invest in Greenwich Sentry Partners, L.P., did you speak to anyone at PricewaterhouseCoopers (Netherlands) about your investment?

A. No, I did not.

Q. Okay. Prior to your decision to invest in Greenwich Sentry Partners, L.P., did

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NATALIA HATGIS

you receive any materials --

A. No.

Q. -- from PricewaterhouseCoopers (Netherlands)?

A. No, I did not.

Q. And prior to your decision to invest in Greenwich Sentry Partners, did you review any materials that may have come from PricewaterhouseCoopers (Netherlands)?

A. Not that I can recall right now.

Q. Now I'm going to switch to after you made your investment.

A. Okay.

Q. After making your investment in Greenwich Sentry Partners, L.P., did you speak to anyone with PricewaterhouseCoopers (Netherlands)?

A. No, I did not.

Q. And after making your investment in Greenwich Sentry Partners, L.P., did you receive any materials from PricewaterhouseCoopers (Netherlands)?

A. Not that I can recall.

Q. Do you recall reviewing any materials

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NATALIA HATGIS

that may have come from PricewaterhouseCoopers (Netherlands) after making your investment?

A. No, I don't recall.

Q. Based on the answer you just gave regarding PricewaterhouseCoopers (Netherlands), would you agree with me that it's fair to say that you didn't rely on anything from PricewaterhouseCoopers (Netherlands) --

MR. VICKERY: Objection to form.

Q. -- in making your decision to invest in Greenwich Sentry Partners?

MR. VICKERY: If you understand the question, you can answer it.

THE WITNESS: Can you please rephrase that or just repeat it?

BY MS. PIERCE:

Q. Sure. Based on the things we were just talking about, the questions I was asking and the answers you were giving?

A. Yes.

Q. Would you agree with me that it would be fair to say that you would not have relied on anything from PricewaterhouseCoopers (Canada) -- or, excuse me, PricewaterhouseCoopers

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NATALIA HATGIS

(Netherlands) in making the decision to invest in Greenwich Sentry Partners, L.P.?

MR. VICKERY: Do you understand the question?

THE WITNESS: No. I'm sorry.

BY MS. PIERCE:

Q. Just to -- my understanding of the testimony you just gave is that you have had no contact prior to or after making your investment with PricewaterhouseCoopers (Netherlands)?

A. Right.

Q. So would you agree with me then that you didn't rely on anything that PricewaterhouseCoopers (Netherlands) did --

A. As far as I can remember right now.

Q. -- in making your investment?

A. I agree.

Q. Do you understand that you have sued PricewaterhouseCoopers (Netherlands) in this litigation?

A. I understand that.

Q. Are you aware, though, that PricewaterhouseCoopers (Netherlands) was not the auditor of Fairfield Greenwich Group?

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NATALIA HATGIS

A. Am I aware that it was not the auditor? I am aware right now.

Q. Are you also aware that PricewaterhouseCoopers (Netherlands) never performed an audit of Greenwich Sentry Partners, L.P., the fund in which you invested?

A. I have no knowledge at all of whether you are or not or did or not.

Q. Can I turn your attention to Exhibit 5?

A. Yes. Exhibit 5, yes.

Q. And if you could turn to the page that has the -- it's Bates-stamped Hatgis 0000758.

A. Yes.

Q. And is that the page you're looking at at the top, does it have a black bar that says "Value Added" --

A. Yes.

Q. -- "By FGG"?

A. Yes.

Q. So, just based on that heading, do you recognize as this being a Fairfield Greenwich Group document?

A. I consider it as being a PowerPoint TSG Reporting - Worldwide 877-702-9580

NATALIA HATGIS

presentation that I probably saw.

Q. And do you think that it was prepared by Fairfield Greenwich Group?

A. I think so, yes. It has its letterhead.

Q. Now, the second line in the text below that, that heading, says "Independent Verification of Prices and Account Values"?

A. Yes.

Q. Do you remember your testimony about that statement earlier today?

A. No, I don't.

Q. You, what I understood you to say earlier --

A. Okay.

Q. -- and we can go back and find the testimony --

A. Sure.

Q. -- if you would like, but what I recall understanding you saying was that you would have relied on the fact that, when you read this, you would have understood and relied on the fact that Fairfield Greenwich Group was being audited by a legitimate accounting firm?

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NATALIA HATGIS

A. Yes.

Q. And that that firm -- Excuse me. I'm trying to read some notes. Just a sec.

A. That's okay.

Q. So when you were discussing that statement, you connected it to auditors; do you recall that in your testimony earlier today?

MR. VICKERY: Objection to form. I don't know exactly what was said earlier, but --

THE WITNESS: Yeah, I don't, I mean -- BY MS. PIERCE:

Q. We can go back and find it then. Okay. Then let's -- let me start over. Let me try again.

So we just agreed that this was a Fairfield Greenwich Group document?

A. Yes.

Q. As far as you understand it?

A. Yes.

Q. And at the top it says "Value Added By Fairfield Greenwich Group"?

A. Yes.

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NATALIA HATGIS

Q. So what do you understand that to mean, "Value Added by Fairfield Greenwich Group"?

A. That meant what were the advantages to me, what were the advantages of going with the Greenwich Group as opposed to another group. So what were their value added by their different services that set them apart and explained their management fees.

Q. And nothing in this, in this page right here, independent of your understanding that we talked about today, nothing actually says that this is value added by an auditor?

A. No, it does not, and it does not list your name.

Q. It does not list PricewaterhouseCoopers at all?

(Continued on the next page to include the jurat.)

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1 NATALIA HATGIS
 2 A. On this page, no.
 3 **Q. Okay.**
 4 MS. PIERCE: Thank you. I think those
 5 are all -- I think those are all the
 6 questions I have.
 7 THE WITNESS: Thank you.
 8 THE VIDEOGRAPHER: The time is 7:11
 9 P.M. We're going off the record.
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 25

 NATALIA HATGIS

Subscribed and sworn to
 before me this day
 of 2011.

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1 NATALIA HATGIS
 2
 3 CERTIFICATE
 4 STATE OF NEW YORK)
 : ss
 5 COUNTY OF NEW YORK)
 6 I, Kathy S. Klepfer, a Registered
 7 Merit Reporter and Notary Public within and
 8 for the State of New York, do hereby
 9 certify:
 10 That NATALIA HATGIS, the witness whose
 11 deposition is herein before set forth, was
 12 duly sworn by me and that such deposition is
 13 a true record of the testimony given by such
 14 witness.
 15 I further certify that I am not
 16 related to any of the parties to this action
 17 by blood or marriage and that I am in no way
 18 interested in the outcome of this matter.
 19 In witness whereof, I have hereunto
 20 set my hand this 30th day of June, 2011.
 21
 22
 23
 24
 25

 KATHY S. KLEPFER, RPR, RMR, CRR, CLR

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1 NATALIA HATGIS
 2 INDEX

3 TESTIMONY OF N. HATGIS:	PAGE
4 Examination by Ms. Ricciardi	7
5 Examination by Ms. McGovern	317
6 Examination by Ms. Crawford	350
7 Examination by Ms. Pierce	373
8	
9 NATALIA HATGIS EXHIBITS:	PAGE
10 Exhibit 1, a document bearing Bates Nos. Hatgis 002044	54
11 Exhibit 2, a document bearing Bates Nos. Hatgis 002057 through 002061	57
12 Exhibit 3, a document bearing Bates Nos. Hatgis 000248 to 000249	74
13 Exhibit 4, Addendum to Plaintiffs' Responses and Objections to Defendants' Joint First Set of Interrogatories to Plaintiffs for Plaintiff Natalia Hatgis	85
14 Exhibit 5, a document bearing Bates Nos. Hatgis 000739 through 000820	126
15 Exhibit 6, a document bearing Bates Nos. Hatgis 0001910 through 0002034	156
16 Exhibit 7, a document bearing Bates Nos. Hatgis 000290 through 000292	168
17	
18	
19	
20	
21	
22	
23	
24	
25	

TSG Reporting - Worldwide 877-702-9580

1 NATALIA HATGIS
 2 INDEX (Cont'd.)

3 NATALIA HATGIS EXHIBITS:	PAGE
4 Exhibit 8, a document bearing Bates Nos. Hatgis 000829 through 000830	175
5 Exhibit 9, a document bearing Bates Nos. Hatgis 000307	178
6 Exhibit 10, a document bearing Bates Nos. Hatgis 0002149	184
7 Exhibit 11, a document bearing Bates Nos. ANWAR-CCI-000095 through 0000104	187
8 Exhibit 12, a document bearing Bates Nos. ANWAR-CCI-0000115 through 0000124	187
9 Exhibit 13, a document bearing Bates Nos. FGANW002895361 to 2895362	205
10 Exhibit 14, a document bearing Bates Nos. Hatgis 000281 through 000286	208
11 Exhibit 15, a document bearing Bates Nos. Hatgis 0001828 through 1829	211
12 Exhibit 16, Addendum Number 2 to Plaintiffs' Responses and Objections to Defendants' Joint First Set of Interrogatories to Plaintiffs for Natalia Hatgis	216
13 Exhibit 17, a document bearing Bates Nos. Hatgis 0003019 to 3020	224
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

TSG Reporting - Worldwide 877-702-9580