

IN THE CIRCUIT COURT OF CLINTON COUNTY, MISSOURI

BEVERLY LONG, et al.,

Plaintiffs,

vs.

PRIME TANNING CORP., et al.,

Defendants.

Case No. 09CN-CV00422

CROSS-NOTICE OF VIDEOTAPED DEPOSITION
OF BOB SKACH

TO: Thomas P. Cartmell
 Brian J. Madden
 Thomas L. Wagstaff
 WAGSTAFF & CARTMELL LLP
 4740 Grand Avenue, Suite 300
 Kansas City, MO 64112

F I L E D
 OCT 12 2010
 MOLLY LIVINGSTON
 Clerk of Clinton Co. Circuit Court

YOU ARE HEREBY NOTIFIED that the deposition of Bob Skach will be taken before an officer duly authorized to administer oaths on October 20, 2010, at 9:00 a.m. at the law offices of Shook, Hardy & Bacon, L.L.P., 2555 Grand Boulevard, Kansas City, MO 64108-2613 (816) 474-6550. The deposition shall continue until 6:00 p.m. or, if not finished, from day to day until completed. Reporting services shall be provided by Tammy G. Loy, Certified Court Reporter, 1500 East College Way, Suite A-378, Mt. Vernon, WA 98273; Tel. 360-428-4086; and the videographer services will be by TBC Video Productions, 300 NW Victoria Drive, Lee's Summit, MO 64086 – tel. 816-221-3376.

Respectfully submitted by,

SHOOK, HARDY & BACON, L.L.P.



Mark D. Anstoetter Mo. Bar #47638

George E. Wolf Mo. Bar #35920

Christopher M. McDonald Mo. Bar #39559

2555 Grand Blvd.

Kansas City, MO 64108

Telephone: (816) 474-6550

Fax: (816) 421-5547

manstoetter@shb.com

gwolf@shb.com

cmcdonald@shb.com

ATTORNEYS FOR DEFENDANT BURNS
& MCDONNELL ENGINEERING
COMPANY, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via U.S. Mail, postage prepaid, this 11th day of October, 2010, to:

Thomas P. Cartmell
Brian J. Madden
Thomas L. Wagstaff
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112

Thomas V. Girardi
Girardi Keese
1126 Wilshire Blvd.
Los Angeles, CA 90017-1904

Stephen Griffin
W. Mitchell Elliott
Troy Dietrich
Griffin Dietrich Elliott
416 N. Walnut
Cameron, MO 64429

ATTORNEYS FOR PLAINTIFFS

William G. Beck
Douglas R. Dalglish
Robert G. Rooney
Lathrop & Gage LLP
2345 Grand Blvd., Suite 2800
Kansas City, Missouri 64108

**ATTORNEYS FOR DEFENDANT
ELEMENTIS LTP L.P.**

R. Dan Boulware
Todd H. Bartels
Seth C. Wright
Polsinelli Shughart PC
3101 Frederick Avenue
St. Joseph, MO 64506

Dennis J. Dobbels
Polsinelli Shughart PC
Twelve Wyandotte Plaza
120 W. 12th Street

Kansas City, MO 64105

**ATTORNEYS FOR DEFENDANTS
PRIME TANNING CORP.,
PRIME TANNING CO., INC.
AND WISMO CHEMICAL CORP.**



ATTORNEY FOR DEFENDANT
BURNS & MCDONNELL
ENGINEERING COMPANY, INC.