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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 SOUTHERN DIVISION

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5 THOMAS AND PAMELA MCINTOSH)
6 Plaintiffs)
7 -vs-)
8 STATE FARM FIRE & CASUALTY COMPANY,)
9 FORENSIC ANALYSIS & ENGINEERING)
10 CORPORATION, AND E. A. RENFROE &)
11 COMPANY, INC., AND DOES 1 THROUGH)
12 10,)
13 Defendants.)

CIVIL ACTION NO. :
1:06-CV-1080-LTS-RHW

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DEPOSITION OF
A. BRIAN FORD
ATHENS, GEORGIA
WEDNESDAY, OCTOBER 10, 2007

2

1 IN THE UNITED STATES DISTRICT COURT

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1 that you have not produced that are in that material that
2 you brought with you?

3 A Some weather data I obtained in working
4 for a different company.

5 Q Okay.

6 A A sample report from another company. My
7 personal notes throughout this entire process, I
8 guess.

9 Q Okay. How far back would those personal notes
10 go?

11 A Probably starts in May of '06.

12 Q With your meeting -- around the time of your
13 meeting with Mr. Scruggs?

14 A Right.

15 Q Was there any suggestion in that meeting that
16 you make personal notes?

17 A No.

18 Q Okay. You just decided to do that on your own?

19 A (Witness nods head affirmatively.)

20 Q Did you make notes of that meeting?

21 A No.

22 Q Okay. Is there any particular reason you
23 didn't make notes of that meeting, but you made notes of
24 other meetings and conversations, say, with Ms. Platt and
25 Mr. Canada, for example?

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1 A It was probably because I did all of the

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2 talking. I mean, it was much like this
3 conversation. They would ask questions and I would
4 answer it.

5 Q Okay. And how long did that meeting in May of
6 '06 -- how long did it last?

7 A Not as long as this.

8 Q Okay. Well, you have been here a little over
9 three hours so was it less than three hours, two hours or
10 less?

11 A Three hours?

12 MR. WYATT: I think it has been longer than
13 three hours.

14 THE WITNESS: Three hours?

15 MR. WEBB: I thought we had four hours left.

16 MR. WYATT: No. I think we are way past
17 that.

18 MR. WEBB: I thought we had four hours left.

19 THE WITNESS: Three or four hours.

20 BY MR. WEBB:

21 Q Okay. And who all was present at that meeting?

22 A Dicky Scruggs, Zack Butterworth.

23 Q Do you know Zack Butterworth was -- or is?

24 A He is a lawyer from the Coast.

25 Q Okay. Who else?

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1 A Derek.

2 Q Okay. Meaning Mr. Wyatt here to my right?

3 A Right. And Darren Versiga and myself.

4 Q But did you bring any documents or photographs

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5 or other tangible information to that meeting?

6 A Yes.

7 Q What did you take?

8 A I prepared an agenda for myself to discuss
9 things.

10 Q Okay.

11 A And I prepared exhibits of documents that
12 I had.

13 Q Okay. Is that agenda and are those documents
14 in the material that you have -- that you haven't
15 produced?

16 A Some of it, yes.

17 Q Okay. When you say some of it, how do you
18 distinguish between what has -- what is there --

19 A I don't know if all of the exhibits are
20 still there. I don't know if I have taken any out.

21 Q Okay. And did you provide a copy of that
22 information or those documents and that agenda to the
23 lawyers you were meeting with?

24 A No.

25 Q Okay. You kept that yourself?

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1 A Yes.

2 Q Okay. What -- is there any particular reason
3 that you haven't included your agenda and your exhibits
4 to the extent that you have them with the material that
5 you produced voluntarily here today?

6 A Why would I come in and give you
7 everything I have?