

EXHIBIT H

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ESTHER KIOBEL, individually and on behalf of her
late husband, DR. BARINEM KIOBEL, BISHOP OF
AUGUSTINE NUMENE JOHN-MILLER, DORNUBARI ANSLEM
JOHN-MILLER, CHARLES BARIDORN WIWA, ISRAEL
PYAKENE NWIDOR, KENDRICKS DORLE NWIKPO, ANTHONY
B. KOTE-WITAH, VICTOR B. WIFA, DUMLE J. KUNENU,
BENSON MAGNUS IKARI, LEGBARA TONY IDIGIMA, PIUS
NWINEE, SIMEON DEDDOA, KPOBARI TUSIMA,
individually and on behalf of his late father
CLEMENT TUSIMA, and individually on behalf of all
others similarly situated,

Plaintiffs,

-against-

Civil Action No.
02 CV 7618

ROYAL DUTCH PETROLEUM COMPANY and
SHELL TRANSPORT AND TRADING COMPANY,
P.L.C.,

Defendants.

KEN WIWA, individually, et al, individually and
as Executor of the Estate of his deceased father
KEN SARO-WIWA; OWENS WIWA; BLESSING KPUINEN,
individually and as the Administratrix of her
late husband JOHN KPUINEN; KARALOLO KOGBARA;
MICHAEL TEMA VIZOR; LUCKY DOOBEE, individually
and as the Administrator of the Estate of his
late brother SATURDAY DOOBEE; FRIDAY NUATE,
individually and as Administratrix of the Estate
of her late husband FELIX NUATE; MONDAY GBOKOO,
brother of the late DANIEL GBOKOO; DAVID KIOBEL,
individually and on behalf of his siblings STELLA
KIOBEL, LEESI KIOBEL and BARIDI KIOBEL and on
behalf of his minor siblings, ANGELA KIOBEL and
GODWILL KIOBEL for harm suffered for the wrongful
death of father DR. BARINEM KIOBEL; JAMES B.
N-NAH, individually and as Administrator for his
late brother N-NAH UEBARI,

Plaintiffs,

-against-

Civil Action No.
96 CV 8386

ROYAL DUTCH PETROLEUM COMPANY and
SHELL TRANSPORT AND TRADING COMPANY,
P.L.C.,



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KEN WIWA, et al., individually and as Executor of
the Estate of his deceased father, KEN SARO-WIWA;
OWENS WIWA; BLESSING KPUINEN, individually and as
the Administratrix of the Estate of her late
husband JOHN KPUINEN; MICHAEL TEMA VIZOR; LUCKY
DOOBEE, individually and as the Administrator of
the Estate of his late brother SATURDAY DOOBEE;
FRIDAY NUATE, individually and as Administratrix
of the Estate of her late husband FELIX NUATE;
MONDAY GBOKOO, brother of the late DANIEL GBOKOO;
DAVID KIOBEL, individually and on behalf of his
siblings STELLA KIOBEL, LEESI KIOBEL and BARIDI
KIOBEL and on behalf of his minor siblings,
ANGELA KIOBEL and GODWILL KIOBEL for harm
suffered for the wrongful death of father DR.
BARINEM KIOBEL,

Plaintiffs,

-against-

Civil Action No.

01 CV 1909

BRIAN ANDERSON,

Defendant.

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Tuesday, May 11, 2004

9:08 a.m.

Deposition of DORNUBARI ANSLEM

JOHN-MILLER, taken by Defendants, at the offices
of Berger & Montague, P.C., 1622 Locust Street,
Philadelphia, Pennsylvania, before Jennifer S.
Walker, Registered Professional Reporter and
Notary Public in and for the Commonwealth of
Pennsylvania.

1 DORNUBARI ANSLEM JOHN-MILLER

2 A Maybe about two or three checks.
3 That's it. About two or three. I'm not very
4 sure.

5 Q Do you recall the amounts of the other
6 checks that you received besides the first one?

7 A Not that I know of. I don't know the
8 exact amounts.

9 Q Were those checks also in U.S. dollars?

10 A Yes.

11 Q Have you received money from Berger &
12 Montague in any other form for humanitarian
13 purposes in Benin?

14 A No.

15 Q What did you do with the money that you
16 received from Berger & Montague for humanitarian
17 purposes?

18 A When I received the funds, what I did
19 was to send it to the witnesses in Benin.

20 Q How did you send the money to Benin?

21 A I sent it by Western Union to them.

22 Q Did you keep the record of the
23 transfers from Western Union?

24 A I've got so many papers in my home, so
25 I don't know whether I stuck them somewhere

1 DORNUBARI ANSLEM JOHN-MILLER

2 there, but I can check, but I'm not very sure of
3 that. I'm not very positive if I did keep it.

4 Q Do you have any idea how much money you
5 transferred by Western Union?

6 A No.

7 Q To whom did you address the money in
8 Benin?

9 A I know I sent the money to Lete
10 Gbarale.

11 Q Is that L-E-T-E?

12 A Yes. G-B-A-R-A-L-E.

13 Q Did you send the money to the attention
14 of anyone else?

15 A No.

16 Q Why did you send the money to Lete
17 Gbarale?

18 A Happens to be the representative of the
19 witnesses. They told me this is the person -- if
20 you want to send anything to us, send it through
21 him because he has documentation to be able to
22 pick up the money from Western Union. That was
23 why he was sent the money.

24 Q When you say, "they told me" that Lete
25 Gbarale was the representative of the witnesses,

1 DORNUBARI ANSLEM JOHN-MILLER

2 who do you mean by "they"?

3 A I asked the witnesses, who do I send
4 this money to since you have to eat and feed, who
5 do I send it to so that person can distribute
6 these funds to you for those purposes. Then they
7 said give it to Lete Gbarale because he has the
8 necessary documentation to pick up the money from
9 Western Union.

10 The way it works in Africa
11 is, you can be sent money, but if you don't have
12 specific forms of identification, they cannot
13 release the funds. So you must have such
14 identification before they release the funds, and
15 he was the one who had those identifications.
16 That is why I had to send it to him.

17 Q Which witnesses in Benin did you speak
18 with regarding what you just told me?

19 MR. WHINSTON: Regarding
20 who has -- who's authorized to receive
21 money?

22 MR. REYNOLDS: You
23 testified, "I asked the witnesses who do I
24 send this money to." I'm asking which
25 witnesses did you speak with?

1 DORNUBARI ANSLEM JOHN-MILLER

2 Q Have you ever had a telephone call with
3 anyone in Benin other than on the occasion you
4 just mentioned?

5 A I've had phone calls with refugees in
6 Benin by virtue of my position as president of
7 National Union of Ogoni students, and I
8 oftentimes get updates on the situation in the
9 refugee camp from them.

10 Q Have you, yourself, ever been to Benin?

11 A Yes. I went to Benin, and I've been to
12 Benin --

13 Q Besides the time you were in the
14 refugee camp?

15 A After the refugee camp, I've been
16 there.

17 Q How many times?

18 A I've been there several times because
19 I've been back there on fact-finding missions to
20 Benin. I also went there to meet with UNHCR
21 officers to discuss the plight of the refugees
22 having nothing to do with this case.

23 Q When's the last time you were in Benin?

24 A I think the last time I was in Benin
25 was in March. When I went there --

1 DORNUBARI ANSLEM JOHN-MILLER

2 MR. WHINSTON: He just
3 asked you when.

4 THE WITNESS: Okay. In
5 March.

6 BY MR. REYNOLDS:

7 Q Are you referring to March of 2003?

8 A March of 2004.

9 Q Oh, I see. How long did you spend in
10 Benin in March of 2004?

11 A I think about two days.

12 Q Where did you go in Benin?

13 A I went to meet with the United Nations
14 High Commission of Refugees.

15 Q Did you meet with anyone else in Benin
16 during that trip?

17 A I met with Ogoni refugees in the camp.

18 Q Which refugees did you meet with?

19 A Ogoni refugees in the UNHCR camp.

20 Q Do you recall the names of any of the
21 refugees with whom you met during this trip?

22 A I can't recall the exact name, but I
23 met with a cross-section of the refugees and
24 addressed them.

25 Q What did you address them about?

1 DORNUBARI ANSLEM JOHN-MILLER

2 MR. WHINSTON: Just if
3 you -- I'm going to caution you that to the
4 extent that your work was done at the
5 request of counsel, that will be covered by
6 the attorney work-product privilege. And if
7 any of the questions raise that, just please
8 let the questioner know that "I did that
9 work on behalf of counsel."

10 THE WITNESS: This
11 particular trip, the particular assignment
12 or the meeting in Benin had nothing to do
13 with Berger & Montague. I am president of
14 National Union of Ogoni Students. I get
15 situation reports from refugees.

16 And on this particular
17 occasion, the refugees had concerns about
18 their treatment by the UNHCR, and I had to
19 meet with the UNHCR to find out what was the
20 problem between them and the refugees.

21 When I discussed it with
22 the UNHCR, I went back to address the
23 complaints with the refugees, and that's it.

24 BY MR. REYNOLDS:

25 Q Who was the person from the United

1 DORNUBARI ANSLEM JOHN-MILLER

2 Nations High Commission with whom you met?

3 A I can't recall the particular officer,
4 but I know when I got there, I met with somebody.

5 Q Do you have copies of the situation
6 reports to which you referred?

7 A I don't have it. What they normally do
8 is they call me and tell me.

9 Q Do you receive any reports from Benin
10 in writing?

11 A Not of recent.

12 Q When's the last time you received a
13 report in writing from Benin?

14 A I think several years back.

15 Q Are you referring to a time period
16 after 2000?

17 A Not 2000. Before 2000.

18 Q Do you have those written reports?

19 A I don't think I have them.

20 Q Have you ever looked for them?

21 A I did.

22 Q When?

23 A When I was looking for documents for
24 this case because I had to search everything I
25 had that I had to give to the lawyers.

1 DORNUBARI ANSLEM JOHN-MILLER

2 Q When did you search for those
3 documents?

4 A I can't recall the exact time, but I
5 know I was asked to look for every document that
6 I have on Ogoni by attorneys. I did look for
7 them.

8 Q Do you know which year you looked for
9 these documents in?

10 A I looked for documents in 2004.

11 Q Do you have any sense of the month in
12 2004 when you looked for these documents?

13 A I don't have any idea of the particular
14 month.

15 MR. WHINSTON: I would note
16 that it's a matter of record when we
17 produced documents on behalf of
18 Mr. John-Miller.

19 BY MR. REYNOLDS:

20 Q Did you make your address to the
21 refugees in Benin at the camp itself?

22 A Yes.

23 Q Do you recall the names of any persons
24 who were present during your address?

25 A The only person I can recall whom I

1 DORNUBARI ANSLEM JOHN-MILLER

2 know very well is Loveday Mtuamwi who happens the
3 to be the chairman of the refugee camp.

4 Q Spell that name.

5 A L-O-V-E-D-A-Y M-T-U-A-M-W-I.

6 Q Is this individual a refugee himself?

7 A Yes.

8 Q Was this individual present in the
9 Benin refugee camp when you were there?

10 A Yes.

11 Q I mean when you were a resident of the
12 camp?

13 A He came after I had left.

14 Q Did you mention anything about this
15 litigation when you were in Benin in March of
16 2004?

17 A No.

18 Q Were you asked any questions about this
19 litigation?

20 A They had so many questions to ask, but
21 I didn't have the time to address all the
22 questions, so all I did was I told them I'm here
23 to address the concerns you told me about. I'm
24 not here to talk about other subjects because if
25 I have to do that, that will affect my trip. So

1 DORNUBARI ANSLEM JOHN-MILLER

2 I cannot discuss that case with you at this time.
3 That's what I told them.

4 Q Do you recall who asked you about this
5 litigation?

6 A There are so many refugees there, I
7 cannot recall every one who spoke or every
8 question everyone asked.

9 Q Do you recall the specific questions
10 that were asked about this litigation?

11 A There were several questions. I can't
12 recall the particular questions, but there were
13 several questions. Some of them were commending
14 the efforts of those who are joining the suit in
15 this case. It was questions and comments.

16 Q Did anyone ask how much money you were
17 hoping to get in this litigation?

18 A I don't recall that. I don't recall
19 hearing that. I didn't pay attention to all the
20 particular questions.

21 Q Did you answer any questions at all?

22 A I only address concerns relating to
23 their safety and security which was the basic
24 reason for my presence there.

25 Q Did you provide anyone in Benin with

1 DORNUBARI ANSLEM JOHN-MILLER

2 any money when you were there in March of 2004?

3 A No.

4 Q When you were in Benin for two days in
5 March of 2004, had you already wired money to
6 Benin at the instruction of Berger & Montague?

7 MR. WHINSTON: Objection to
8 the form.

9 You can answer.

10 THE WITNESS: I don't
11 recall.

12 BY MR. REYNOLDS:

13 Q Did you provide anyone in Benin with
14 any documents during your trip in March 2004?

15 A No.

16 Q Did you receive any documents when you
17 were in Benin in March of 2004?

18 A No.

19 Q Did you read any documents in the camp?

20 A No.

21 Q Did you discuss this litigation with
22 the United Nations High Commission
23 representative?

24 A I don't recall.

25 Q Do you have plans to go to Benin in the

1 DORNUBARI ANSLEM JOHN-MILLER

2 near future?

3 A I don't know.

4 Q Do you currently have plane
5 reservations for traveling to Africa in the near
6 future?

7 A I only travel when there is a need. I
8 won't say I will travel at this time. If the
9 need arises, then I will travel. If there is no
10 need, then I stay put.

11 Q Do you currently have plane
12 reservations to travel to Africa?

13 A I don't have any at this time.

14 Q Did you visit Benin at any other time
15 in 2004 other than March?

16 A No.

17 Q Who paid for your expenses in traveling
18 to Benin in March of 2004?

19 A In March 2004? I paid for it.

20 Q Did anyone provide you with any
21 financial assistance in connection with your trip
22 to Benin in March of 2004?

23 MR. WHINSTON: You mean did
24 anyone give him money specifically for
25 traveling to Benin in March of 2004?

1 DORNUBARI ANSLEM JOHN-MILLER

2 or --

3 MR. REYNOLDS: Anyone.

4 MR. WHINSTON: Anyone.

5 THE WITNESS: I have not
6 had someone help me. I don't know whatever
7 payment has been made to anyone apart from
8 me. I'm only concerned about what I get.

9 BY MR. REYNOLDS:

10 Q I know that your concern is that -- is
11 about what you get, but I'm just asking, are you
12 aware of anyone else who's been assisting you in
13 any way in connection with this litigation who's
14 also receiving money --

15 A I don't know.

16 Q -- from Berger & Montague?

17 A I don't know.

18 Q Are you currently an officer of NUOS?

19 A I'm the president.

20 Q Do you receive any money at all in
21 connection with serving as president of NUOS?

22 A Voluntary service for the Ogoni people,
23 the Ogoni students.

24 Q That may be responsive to my question,
25 but I'm just asking if you can answer, if you

1 DORNUBARI ANSLEM JOHN-MILLER

2 don't mind, "yes" or "no". Do you receive any
3 money from NUOS?

4 A No.

5 Q Do you receive money from anyone in
6 connection with your position as president of
7 NUOS?

8 A No.

9 Q Do you pay any kind of dues to NUOS?

10 A I pay my dues.

11 Q How much are your dues?

12 A I think it's \$5 every month. Of
13 recent, it's been increased to \$10.

14 Q Does NUOS have any paid employees?

15 A No.

16 Q Does NUOS have an office?

17 A No.

18 Q Do you use your home in Chicago as an
19 office for NUOS?

20 A Yes.

21 Q Do you maintain NUOS documents at your
22 home?

23 A Not all the documents. Some of the
24 documents, I -- depending on what sort of
25 documents. The ones I have, I have some. I have

1 DORNUBARI ANSLEM JOHN-MILLER

2 some documents. And those are press releases I
3 have signed. Maybe some materials I got from the
4 Internet and so on and so forth.

5 Q Do you store these materials in files?

6 A They are all hard copies.

7 Q Do you organize your papers in terms of
8 files?

9 A No.

10 Q You just have papers all over the
11 place?

12 A I just have papers in bags or maybe
13 portfolios.

14 Q When you say portfolios, do you mean
15 folders?

16 A Yes, folders and maybe what do I call
17 it my hand -- I have this kind of suitcase, and I
18 just stuff papers in it with my schoolwork and
19 maybe some interesting papers from publications
20 on the Internet on Ogoni and so on. I just put
21 them there. That's all I do. I don't have a
22 systemic arrangement of my documents.

23 Q Do you store documents at any location
24 other than your home?

25 A No.

1 DORNUBARI ANSLEM JOHN-MILLER

2 Q Do you have an active e-mail account?

3 A I do.

4 Q Do you send e-mails related to NUOS to
5 anyone?

6 A Yes. I communicate with my officers.

7 Q Do you also use e-mail to say
8 communicate with members of NUOS?

9 A Yes.

10 Q Does NUOS produce any newsletters or
11 pamphlets?

12 A We're in the process of doing something
13 like that.

14 Q Do you ever send NUOS updates to
15 officers and members?

16 A Yeah. Yes, we do that.

17 Q Have you ever sent any e-mail related
18 to NUOS that mentions Shell in any way?

19 MR. WHINSTON: Objection to
20 the form.

21 You can answer.

22 THE WITNESS: I know we've
23 sent several e-mails, press releases on
24 Shell to the public.

25

1 DORNUBARI ANSLEM JOHN-MILLER

2 BY MR. REYNOLDS:

3 Q Can you think of any other documents
4 that are related to NUOS that mention Shell?

5 A Apart from press releases, I don't
6 know. Maybe community speech at the university
7 of Port Harcourt.

8 Q Isn't it true you make speeches on
9 behalf of NUOS?

10 A I do.

11 Q Have you ever mentioned Shell in any of
12 your speeches?

13 A The MOSOP struggle is all about the
14 persecution of Shell. Definitely when I make my
15 speeches, I talk about Shell.

16 Q Do you keep copies of your speeches at
17 home?

18 A I don't keep copies -- I don't prepare
19 notes. All I do is speak because it's in my
20 memory.

21 Q Are you saying that you never write
22 down your speeches?

23 A I've not gone that in-depth where I
24 have to sit down and write a paper. The previous
25 materials I have I have already submitted to the

1 DORNUBARI ANSLEM JOHN-MILLER

2 lawyers when they asked for documents.

3 Q I'm asking if when you give speeches,
4 do you ever take an outline or write notes down
5 as to what you might say?

6 A I don't.

7 Q Have any of your speeches ever been
8 published?

9 A A lot of speeches have been published.
10 Even when I was here in the U.S., newspapers and
11 radio stations have carried my interviews and
12 also my speeches.

13 Q Do you keep copies of any of those
14 documents?

15 A I don't.

16 Q Are you saying that you don't have a
17 single speech in your house which you gave?

18 A I don't write speeches.

19 Q You mentioned that some of your
20 speeches have been published or put on the
21 Internet or what have you. Do you have any of
22 those speeches in hard copy at home?

23 A Everything I had I have already given
24 out to lawyers.

25 Q I didn't ask you that. I'm asking, do

1 DORNUBARI ANSLEM JOHN-MILLER

2 you have at home any hard copies of any speeches
3 that you've ever given?

4 A I will check in my materials and see
5 whether there is anything I have. I don't
6 normally keep track of everything that is
7 published about me. I don't keep track of that.

8 Q Did you hand over more than one stack
9 of documents to your attorneys in connection with
10 this litigation?

11 A I gave them every document I had.

12 Q Did you give them more than one package
13 containing documents?

14 MR. WHINSTON: Objection to
15 the form.

16 You can answer.

17 THE WITNESS: I can't
18 recall the number of packages I give them.
19 I know that every document I have on Ogoni,
20 I have always made accessible to them.

21 BY MR. REYNOLDS:

22 Q Approximately how many pages have you
23 turned over to your lawyers?

24 A There are so many. I can't recall the
25 number.

1 DORNUBARI ANSLEM JOHN-MILLER

2 Q Do you use a word processor on your
3 computer?

4 A I have Microsoft Word.

5 Q Do you type documents on Microsoft Word
6 on your computer?

7 A I type my notes.

8 Q What are the notes for that you're
9 typing?

10 A I'm a very busy man. I do work on so
11 many subjects. I talk about human rights, talk
12 about environment, I discuss about AIDS and so on
13 and so forth. Different things I have to talk
14 about, that's what I type. I don't keep track of
15 everything I type or what I type about.

16 Q Do you type notes on your computer
17 regarding the Ogoni struggle?

18 A Yes. I might have had something like
19 that. It also depends on what that thing I'm
20 typing about is because when I was in school, and
21 we talked about the social movement of Ogoni --
22 type about social movement of Ogoni, the MOSOP
23 movement. Things like assignments I type on my
24 computer.

25 Q Do you save the documents that you type

1 DORNUBARI ANSLEM JOHN-MILLER

2 on the computer?

3 A Of course.

4 Q How long have you been using the
5 computer you have now?

6 A The one I just said I bought in 2004.

7 Q Did you transfer files from your
8 previous computer to your current computer?

9 A No. I didn't do that. My previous
10 computers were bad and all my wife did was
11 carried and dumped in the trash can. That's it.
12 I asked her, "Why didn't you allow me the hard
13 drive so I can transfer documents?" She said,
14 "Well, I didn't know all that."

15 Q Who paid for the computer you have now?

16 A Myself. Personal computer.

17 Q Has Berger & Montague ever paid for any
18 equipment that you have?

19 A No.

20 Q Does Berger & Montague provide you with
21 any money in connection with a car that you use?

22 A A car? Of course, when I travel, and I
23 have to -- that should be part of -- maybe I
24 explain -- they might pay for it. Also depends
25 on what the assignment is all about. If it's

1 DORNUBARI ANSLEM JOHN-MILLER

2 Q You're saying that separately and after
3 that address, it was arranged that you would have
4 a meeting with the witnesses in Benin in this
5 litigation?

6 A Yes.

7 Q Do you know who arranged that meeting?

8 A No one arranged it.

9 Q How did you know which people to ask to
10 meet with?

11 A I got information because when I gave
12 the form -- I got information before I went there
13 about the people in Benin. Based on that
14 description, when I got there, all I did was, as
15 soon as I finished my trip, I met with them
16 briefly and just exchanged pleasantries with them
17 and then I left, which is where I described that
18 we just shook hands and read papers and chatted
19 about the situation.

20 Q Did you say you read papers?

21 A Read newspapers I brought from Nigeria,
22 which I was reading to keep me busy when I was
23 traveling.

24 Q You gave current newspapers to the
25 Benin witnesses?

1 DORNUBARI ANSLEM JOHN-MILLER

2 A Yes.

3 Q Did you give Benin witnesses anything
4 else?

5 A No. That is all.

6 Q Did you give them any money?

7 A No.

8 Q Did they ask for any money?

9 A No. They didn't ask me for money.

10 Q Did they ask you for anything?

11 A No.

12 Q Did they ask you for food or
13 humanitarian aid?

14 A I know they mentioned something about
15 that we should try and send them some food items.
16 It was based on that information that when I got
17 back, we sent them money for food and so on and
18 so forth.

19 Q What specifically do you recall the
20 Benin witnesses asking you for when you visited
21 them in March 2004?

22 A All I know is that they said they need
23 feeding money -- they should be sent money for
24 their feeding. That's all I mentioned when I got
25 back and passed on that information to the

1 DORNUBARI ANSLEM JOHN-MILLER

2 lawyers and sent money for that purpose.

3 Q When you visited Benin in March 2004,
4 did the Benin witnesses with whom you met ask you
5 for money?

6 A Didn't ask me for money.

7 Q Did they ask you for money for food?

8 A They said food. They mentioned food
9 specifically. They didn't ask for money. I told
10 them clearly that "Look, I cannot provide for all
11 of you. All I can do is provide money for food.
12 I don't go to farm in Benin. When I get back,
13 I'll pass on the message to folks here," which I
14 did.

15 Q You mentioned that you were provided
16 with information prior to going to Benin about
17 the witnesses in Benin?

18 A (Witness nods head.)

19 Q Who provided you with that information?

20 A I'm sure that must have been one of the
21 assignments I was given by Berger & Montague.

22 Q So now you're saying that your trip to
23 Benin in part regarded an assignment you had for
24 Berger & Montague?

25 A Right. After that assignment for

1 DORNUBARI ANSLEM JOHN-MILLER

2 Berger & Montague, I dealt with the refugee issue
3 which is personal, which is quite personal.

4 Q Did the information you got from Berger
5 & Montague about the Benin witnesses appear in
6 writing?

7 A No. I think it was verbal.

8 Q Did you write down the names that you
9 were told?

10 MR. WHINSTON: Objection to
11 the form.

12 BY MR. REYNOLDS:

13 Q Did you write down the information you
14 were provided?

15 A I didn't write down information. I
16 took it in my head when you get to Benin, go to
17 this place, to this place, to see these people.
18 When you get there, just meet with them, that's
19 all.

20 Q How did you know which people -- you
21 get to a refugee camp and there are all kinds of
22 people there. Right? Somebody must have
23 arranged in advance, I take it, for you to meet
24 with the particular persons there who were going
25 to serve as witnesses in this litigation. Right?