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foundation.

THE WITNESS: No, but that would be very logical.

BY MR. HABER:

Q. Now, again, looking again at Exhibit 38. The sentence that we were talking about, "you well know that." Are you with me?

A. Yes.

Q. If you continue, and I'm going to pick up where it says and, "and need far more answers before coming to a recommendation (given the group impact this needs formal signoff by CMD, GAC, et cetera)."

Now you had mentioned the Group Audit Committee earlier and Group Finance?

A. Yes.

Q. Did you understand also when you wrote this that the CMD also needed to approve any debooking or restatement?

MR. TUTTLE: Objection to the form, mischaracterization of prior testimony.

THE WITNESS: Anything that involves external disclosures also needs to be approved by the CMD.
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BY MR. HABER:

Q. So I just want to be clear. So
it's not the debooking in and of itself, it's
the debooking that may require an external
disclosure that would need the approval of these
various bodies?

A. Yes. Yes. It's a materiality
issue that we discussed earlier.

Q. Okay. The last sentence you say,
"I've been absolute clear on this at numerous
occasions."

Were you expressing frustration
with Mr. Coopman?

A. Frank and I ever now and then had
a few disagreements relating to his "Frank the
tank" approach that sometimes he would get a
little bit unbalanced and not involve all the
right people in the decision-making. And I
thought I had made it clear, for instance, on
the meeting the 27th of November that he needed
to talk to Judy Boynton and needed to involve
all the right people.

And at least at that stage,
without knowing any of the detail of what he had
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done or not had done, the Judy Boynton story
clearly said that he had not done it.

Q. Now, if you look at the first
sentence of your e-mail you say, "This is
absolute dynamite, not at all what I expected,
and needs to be destroyed!"

Were you in directing Mr. Coopman
to destroy the document?

A. No. That's obviously not very
good use of words. I never wanted anyone to
destroy anything.

What I meant to say is that the
work was incomplete and it needed to be
improved.

And that's what I said happened
the following morning as soon as I got back when
we sat together with the whole team and we
exactly planned out who was going to do what and
how we were going to get a quality note prepared
for the CMD the following week.

Q. Do you know if Mr. Coopman removed
the -- withdrawn.

Do you know if Mr. Coopman in fact
destroyed his copy of the script?
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A. No, he did not.

Q. When you say this is absolute
dynamite, what did you mean?

A. This sort of refers back to the
communication with Boynton about something that
is so material and so significant you get a note
that sort of says press the button and we go
outside to the market, which would be beyond my
authority. That's what I meant by dynamite.

Q. Okay. Now you said that the next
day, December 3rd, you had a meeting?

A. Yes.

Q. Who attended the meeting?

A. That was a meeting in my office
that was attended by Frank Coopman, Curtis
Frasier, John Darley. I don't know the whole
list of names.

I know that Nicola Gordon made
minutes of that meeting and distributed it
because it was the allocation of who was going
to do what piece of the note to the CMD. There
was going to be a technical part and there was
going to be a part that would deal with the
legal and financial side of that note.
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Q. Was that the only purpose of the meeting?

A. Yes. The purpose was to get quality notes with all the right facts and data to deliver to the CMD as quickly as possible.

Q. Did -- was the discussion largely technical?

A. Well, it was technical but it identified that there needed to be a technical piece to the note, that there needed to be a financial legal part to the note.

Q. Who was responsible for the financial part of the note?

MR. TUTTLE: Objection, mischaracterization of prior testimony.

THE WITNESS: Frank Coopman.

MR. FERRARA: Sorry. I think while some of the room may find the objections to be small barriers on the way to progress, we really need to get the objections on the record before the answer comes up. You're welcome to continue to answer to the questions, but let's get the objection on and not have it interrupted so it's on the record, please.
WALTER VAN DE VIJVER

BY MR. HABER:

Q. Now, in your answer before you said in response to my question of whether the discussion was largely technical you said it was technical, but it was identified that there needed to be a technical piece to the note, that there needed to be a financial, legal part to the note.

Did you understand financial, legal part to be separate parts?

A. Yes.

Q. So the financial part was the responsibility of Mr. Coopman?

A. Yes.

Q. Who was responsible for the legal part?

A. He would do that jointly with Curtis Frasier, who had a dotted reporting line into himself, as well as to me.

Q. When you say "he" are you referring to Mr. Coopman?

A. Yes, sorry.

Q. Why was there a need to draft a note?
WALTER VAN DE VlIVER

A. To get all the facts on the table.

I mean this is part of the process I had been following for a long time with my hunch and instinct that things were not right and ultimately you need to get the facts on the table to make a fact-based decision on what to do.

Q. And this note was to be presented to the CMD?

A. Yes.

Q. Was there a particular scheduled meeting of the CMD that you were planning this note to be presented at?

A. The following week, the 9th of December.

Q. I believe a few moments ago you said there was a meeting of the Conference on December 3rd?

A. Yes.

Q. Did you have this meeting before or after the meeting with the Conference?

A. Before, because I mentioned it was very early in the morning, 7:30 in the morning.

Q. Where did the Conference meet that
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day?

A.  In The Hague.

Q.  Was there any discussion in the
Conference meeting about the reserves issues?

A.  No.

Q.  Do you recall if Ms. Boynton was
in attendance at the Conference meeting?

A.  Yes.

Q.  Do you recall having any
discussions with Ms. Boynton at the Conference
meeting about the script for Walter?

A.  No.

Q.  Did you have any discussions with
Ms. Boynton that day about the actions that were
decided would be taken in the meeting earlier in
the day?

A.  No.  I briefly met her the
following day in London on the 4th of December
where she advised me that there had been a
discussion at CMD in my absence and that it was
decided that for the CMD the coming week I would
only be responsible for writing the technical
piece and that she would look after the
financial, legal piece.
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Q. How did you react to that?

A. Surprised. But for me the only thing was important to get it on the agenda. I didn't really care how it was being done as long as it would get on the agenda.

Q. When you say surprised, why were you surprised?

A. I was surprised because I had hoped by that time she would have talked to Frank Coopman and there would be clarity on how the work was going to be distributed.

Q. Did she explain to you why she was going to be taking the lead on the financial side?

A. No. She just mentioned that the discussion had taken place at CMD the day before and that was the recommendation and she was going to -- after I briefly talked to her she said she would issue a little note to clarify that particular decision.

Q. Did you ever look at the minutes of that CMD meeting to see what was discussed?

A. No, not that I recollect.

Q. Did you talk with Mr. Coopman
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about the decision that she gave -- that she conveyed to you?

A. Yes. I mentioned it to him and left the organization to figure out to get the note, the quality note that at least we would do together. And I assumed Coopman would work with the staff and the staff in Judy's organization.

Q. What was Mr. Coopman's response?

A. He was, as you would expect from a character like that, he was not very happy.

Q. What did he say?

A. He thought he was capable of doing that, leading that piece and sharing it with whoever relevant in the organization.

Q. Did you get the feeling he viewed it as a challenge to his abilities?

A. No, not directly, but he was a bit sensitive individual generally when these type of things happened.

Q. Did you view the decision as a challenge to Mr. Coopman's abilities?

A. A little bit, but I accepted -- I had the organizational structure and authority. I mean, at the end of the day Judy Boynton was
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more senior than Frank Coopman.

Q. Did you view it as a challenge to you?

A. No, but maybe a little inclination of a bit of mistrust whether I would be able to do it all myself but, fair enough, she is the CFO.

Q. I believe earlier you said this meeting occurred in London. Why was it in London?

A. I really don't know. I must have had other engagements in London. I cannot recollect.

Q. Did she ask to meet with you?

A. Yes, but I don't recollect how that sort of happened. Maybe some e-mails. I don't know.

(Van der Vijver Exhibit Number 39 was marked for identification.)

BY MR. HABER:

Q. We've just marked as Exhibit 39 an e-mail string, three pages, the last of which is from Mr. Van de Vijver. It's dated December 8, 2003 and it's to John Pay with a cc to Frank
WALTER VAN DE VIJVER

Coopman, John Darley, John Bell. The subject line reads: Proved reserves part 1: Draft for comment. The Bates number is V00010881 through V00010883.

Have you seen these e-mails before today?

A. Yes.

Q. If you could just generally tell us the context in which these e-mails were written?

A. This was trying to get the note for CMD prepared that we talked about earlier and, obviously, there was a lot of work so there was a lot of backward and forward going to get the document done. And you see here part of the -- see the final top e-mail is some comments that I had on the draft of that particular CMD paper, very depressing, somewhere around midnight when I looked at the note and gave some comments before it was finalized for distribution that same day.

Q. And if you look at the second page, the last e-mail, the one on the bottom from Mr. Pay to you, Ms. Boynton, Tim Morrison,
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with a cc to Frank Coopman, John Darley, and

John Bell, it's dated December 7, 2003?

A. Uh-huh.

Q. It appears as if this is the first
circulation of the draft note; is that correct?

A. Yes. That may be correct, yes.

Q. Do you recall if there was a prior
circulation?

A. I do not recollect.

Q. Okay. If you look about a third
of the way from the top in that first
paragraph --

A. Sure.

Q. -- where you write, "I still feel
uncomfortable." Do you see that?

A. Yes.

Q. The sentence reads, "I still feel
uncomfortable with the "increased tightening of
the SEC guidelines" as if the SEC is the reason
we have a problem today!" Why did you feel
uncomfortable with that?

A. This was part of my learning where
I had the feeling that there was too much
emphasis put to relate a lot of the issues we
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found to this clarification on the SEC rules
that came out somewhere in 2000 or 2001.

I recall also sending a note to
Rod Sidle to ask for his advice to try to
understanding was it basically the problem that
the Shell guidelines were wrong and had been
long wrong, we now sort of had the benefit of
hindsight for a long time, or was it indeed this
clarification in 2001 that caused it.

Is that answer clear? It may be a
little bit long-winded.

Q. And what did Mr. Sidle say in
response?

A. He said that he agreed with me,
that he did not believe the clarification was as
such the issue, it was the issue that Shell for
many years had done the incorrect, incomplete
interpretation of the strict SEC rules, because
the rules hadn't changed. There was a
clarification on the rules, but the rules for
the SEC had been like they were since 1976, if
I'm correct.

Q. The -- does the second sentence,
"The reality appears to be with us driving for
Q. Were you comfortable with the changes that had been made in the note?

A. Personally, no, but I accepted the higher authority in the company to make those changes.

Q. Now, you said the note changes were made in the technical contents of the note?

A. No changes.

Q. No changes, right. So what parts of the note were there changes in?

A. Changes that watered down the conclusive nature of my note, which originally stated that reserves were noncompliant.

There was a table and one of those tables said the following reserves are noncompliant.

And it got changed to are likely to be considered as not compliant.

Q. Why were you uncomfortable with that change?

A. Well, this is a personal perspective. I mean, I thought these reserves were noncompliant. I’m not the expert, I fully recognized that, and that’s the way it is.
Q. Did you ever communicate your feelings about the changes to anyone?

A. I do not recollect.

Q. Now, do you know if the note was submitted in the same format to the other members of the CMD, that is electronically?

A. Yes.

Q. And I believe you said that there was a meeting of the CMD. Was there a meeting on the same date, December 8th, or was there a two-day meeting?

A. No. There was a -- as I said, it was two days of CMD activities. The first day was sort of an off-site type of day and the 9th of December was the formal -- on the Tuesday, the CMD meeting.

Q. And that would be Tuesday, December 9th?

A. Yes.

Q. Before we get to the meeting I want to talk about a couple of things in the note itself.

If you turn to page 4.

If you look at the --
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A. The box.

Q. -- the box. Thank you.

In terms of bookings, and it shows
the time line and there's -- there's a booking,
and I understand it is hard to read, but I
believe the one I'm looking at has to do with
PDO and it says 00, which I take to mean the
year 2000. PDO books, and it looks like
358 million BOE. Do you see that?

A. Yes.

Q. During the time that your staff
was preparing this note and you were reviewing
the note had you seen any audit trail that
supported that booking?

A. No, not at that time.

Q. Did you ever ask anyone on your
staff if they had seen an audit trail that
supported that booking?

A. Yes. And during this period,
December, January -- so December 2003,
January 2004, I did get some documentation that
involved a letter from the Minister of Oil and
Gas that referred to that particular booking.

Q. Did you ever talk to Mr. Brass
WALTER VAN DE VIJVER

about the booking?

A. Not during my time at Shell.

MR. DOWD: That wasn't the question. That wasn't the question.

Did you ever talk to Brass about it? Answer the question.

THE WITNESS: Yes. Yes.

BY MR. HABER:

Q. And when did you speak to Mr. Brass about it?

A. In -- somewhere in the second half of March 2004 when I had -- at the time I had left Shell, but I was visited during the weekend by all The Hague based EP ExCom members.

Q. And what did Mr. Brass and you talk about?

A. Brass, through the sort of chatter we were having at that time, which you can imagine was quite an emotional get together with lots of beer, and Brass mentioned to me a reference to a handshake.

Q. What did he say about a handshake?

A. It was a handshake from Phil Watts to Remco Aalbers.
Q. What was the significance of the handshake?
A. That related to the booking on Oman in early 2000.
Q. And is that the booking that's reflected in the chart?
A. Yes.
Q. For the record, who is Remco Aalbers?
A. Remco Aalbers was in the same job that John Pay did later. So he was a group reserves coordinator at that time.
Q. Did Mr. Brass say from whom he had learned of this handshake?
A. No. I think as soon as Lorin mentioned that he felt embarrassed and didn't give me any further detail.
Q. Did you ask Mr. Darley about this handshake deal?
A. No.
Q. Did you ever ask Mr. Pay about this handshake deal?
A. Not that I recollect, no.
Q. Did you ever talk to Remco Aalbers
WALTER VAN DE VIJVER

about this handshake deal?

A. No.

Q. Had you ever spoken to Remco Aalbers?

A. I think I met him once in NAM during one of my site visits, no, I'm sorry, that's the Dutch operating company in the Netherlands in Assen. I don't have any recollection what -- he was doing a technical job there. I don't really know.

Q. If you could turn the page to page 5 of the document or 447, the Bates number. If you can look at the top of the chart it says, proved reserves which are likely to be considered as noncompliant by the SEC.

Is that the language that you were referring to earlier that had been revised or which is now the revised version of the note?

A. Yes.

Q. Now, if you can turn to page 24 of the note, underneath the box?

A. Uh-huh.

Q. It says, "the 720 million barrels (Shell share) gap between reserves booked and
the base program implies that no realistic projects have been identified to cover this now highly exposed volume."

Was this figure a figure that was reached as a result of the study that David Kluesner was working on?

A. Yes.

Q. And if you look at the next paragraph it says that "major reserves review that SPD carried out in the second half of 2003 also identified that a significant number of projects in the base program (together 814 million barrels) did not fulfill the recently tightened group reserves guidelines which required VAR 3 or FID for compliance with SEC rules as they are now understood."

The major reserves review that's referred there, is that also a reference to the Kluesner work?

A. Yes.

Q. If you can turn to page 30. The heading says, Other Impacts, and then there are four bullet points with text in a box.

Do you recall if what's on page 30
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in the Bates number that ends 472 was in your
note that you submitted to the CMD?

A. I cannot recollect.

Q. And if you look at the next page,
32, that ends Bates number 474, again, under
other impacts there's a bullet point and then
text in a box.

Do you recall if this text was in
your note as originally submitted?

A. No. The only thing I recollect is
that I obviously visited Oman and Nigeria in
early 2004 to tell them what the story was.
There was a lot of discussion at CMD during
January and December about the depth and extent
of the external disclosure, given some of the
sensitivities on countries where we were
operating.

Q. Now, at the meeting of the CMD was
there a discussion about the note?

A. Yes. It is a note to CMD, so that
means there was time allocated for the note at
the meeting.

(Van de Vijver Exhibit Number 41
was marked for identification.)
WALTER VAN DE VIJVER

BY MR. HABER:

Q. What we've marked as van de Vijver Exhibit 41 is a multi-page document, 18 pages to be exact. It says, Committee and Managing Directors, Minutes of the Meeting Held in The Hague on Monday 8 and Tuesday 9 December 2003.

There are two Bate ranges the first one is V00090869 through V00090886.

The second is TT000712 through TT000729.

Mr. Van de Vijver, have you seen this document before?

A. Yes.

Q. Is this a copy of the minutes of the meeting that you were just talking about?

A. Yes.

Q. The indicator in the upper left-hand corner, the number. It says number 2573?

A. Uh-huh.

Q. What is that number?

A. Every CMD meeting gets a number, so that means that was in terms of the company that was meeting 2,573.
WALTER VAN DE VIJVER

Q. Do you know if by taking a look at this this is the final version of the minutes?

A. The structure of it doesn't say draft anymore, implies that this is the final version.

Q. During the discussion of the note how would you describe the mood of the meeting?

A. Very tense.

Q. Why is that?

A. Clearly it was in a very difficult session in terms of questions were being asked. Follow-up meetings were being planned. I mean this was the first of a whole sequence of meetings over the weeks thereafter where we would come back to the same issue again and again.

Q. And was this the official start of Rockford?

A. Yes. This was the first meeting of the formal launch of Rockford.

Q. How did the project get its name?

A. I don't know. That's always a mystique.

Q. Do you recall if Mr. Watts had
WALTER VAN DE VIJVER

said anything during this portion of the meeting
concerning Project Rockford?

A. Well, he chaired the meeting so
clearly he would have said things, but I do not
recollect any of the details.

Q. Now, if you look on the first
page --

A. Uh-huh.

Q. -- of the document it shows the
people who were present?

A. Uh-huh.

Q. Now, for you it shows for item 6
through 21 inclusive only. Does that indicate
that you were not in attendance for items 1
through 5?

A. Yes, that's correct.

Q. And the same is true with regard
to Mr. Brinded?

A. Yes. There was at this time there
had been a system introduced where some of the
agenda items would involve only Watts, van der
Veer, and Boynton.

Q. Why would those agenda items only
involve those three individuals?
WALTER VAN DE VJVER

A. That was something that was discussed in CMD, I think somewhere in 2002 where the sort of more routine sort of items would not require the whole of the CMD to be present and was agreed that the other members obviously would be copied on the material and the minutes but would not attend that part of the meeting.

Q. Now, at this time was Ms. Boynton a member of the CMD?

A. Yes.

Q. And I see a new name, R.J. Routs. Who is R.J. Routs?

A. Rob Routs took over as group managing director from Paul Skinner who retired a couple of months earlier and he was responsible for the oil products business, the downstream business.

Q. When Mr. Routs succeeded Mr. Skinner did you have any private communications with him about the reserves issues?

A. Before it would come to CMD? No.

Q. If you look at the minutes on page
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12. The second to last sentence says, "Urgent attention was required as time was of the essence."

Do you recall a discussion on this topic?

A. No, but I do recollect that a plan was put forward about follow-up meetings.

Q. Did anyone at the meeting say that time was of the essence?

A. I do not recollect.

Q. What was the program of future meetings that you have a recollection of?

A. There were at least weekly meetings on this -- on Project Rockford, but I would have to look at details in terms of the exact dates.

Q. Okay. Now, as I recall, on the first -- on the first day of our proceedings I had asked you a question about the structure of Project Rockford.

How do you -- what is your recollection of how that structure worked? And in particular I'm just trying to get an organizational structure?
WALTER VAN DE VIJVER

A. Yes. Over time a formal structure was put in place. Project Rockford was led by Phil Watts with the assistance of Adrian Loader. And I at that time recommended as the focal point for EP, John Darley.

So there was a structure that involved Legal, Group Finance, and I remember commenting on when that structure was proposed.

Q. And when you recommended John Darley for EP focal point he was to report to whom?

A. In his role he would report to Phil Watts.

(Van de Vijver Exhibit Numbers 42 and 43 were marked for identification.)

MR. HABER: I'm marking two exhibits, Exhibit 42 and an Exhibit 43.

While the witness has an opportunity to look at these documents I will identify them for the record.

Exhibit 42 is a two-page document, the first page has two e-mails on them, the last of which is from Philip Watts, to Adrian Loader, Beat Hess, Curtis Frasier, John Darley, Judith
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Boynton, Tim Morrison, and Mary Jo Jacobi.

There's a cc to Jeroen van der Veer, Mr. Van de Vijver, Malcolm Brinded, Judith Boynton, and Rob Routs. It was sent on February 2nd, 2004.

The -- that is the last. The subject line reads Rockford Coordination Team. There's an attachment, project team org chart, version 71.

It is a document that was produced from the native drives that were produced to us, so there is no Bates number. The summation documentation number in the upper left-hand corner is 100485664: Forward Rockford Coordination Team.

And I will note for the record there's a footer on the bottom of the first page and that came from our printer because that's just way it prints. It's a default, so it's not part of the document.

Exhibit 43 is a series of e-mails, the last of which is from Mr. Van de Vijver, dated February 2nd, 2004. It's sent to Philip Watts with a cc to Adrian Loader, Jeroen van der Veer, Malcolm Brinded, Judith Boynton, Rob Routs, and Beat Hess. There are two Bates ranges. The first is V00370504 through
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VO0370505. The second range is BRINDED 0119 through BRINDED 0120.

BY MR. HABER:

Q. Now, Mr. Van de Vijver, in your answer before we marked these documents you said over time a formal structure took place. Looking at Exhibit 42, is this the structure you're referring to?

A. Yes.

Q. And if you look at Exhibit 42 at Mr. Watts' e-mail of January 29, 2004, it appears that there was a first team meeting of this group of people that was to begin in February.

What team meeting do you understand him referring to?

A. The team meeting, the project team as depicted in this chart.

Q. Okay. Do you recall attending that meeting?

A. No. I was not invited.

Q. And why weren't you invited, if you know?

A. As per the organizational
WALTER VAN DE VIJVER
structure I was not on that list, but I felt
totally comfortable with Curtis Frasier and John
Darley being there.

Q. And why was that?
A. I had recommended those names as
members to the team from the E&P side.

Q. Now, if you look at Exhibit 43,
your e-mail of January 30, 2004, you write to
Mr. Watts, van der Veer, Brinded, Ms. Boynton,
and Mr. Routs, and I'm looking at the first
sentence, "I thought the idea was to delegate
day-to-day management to a group of very senior
and capable leaders in our organization below
CMD and, hence, was very supportive of an
overall coordination of an effort by Adrian
Loader with weekly updates to CMD."

Two sentences later you continue.
"The proposal put forward still
has several CMD members on the actual team and I
would advise against that to ensure adequate
delegation, balance, and ownership."

Did you get any response from
Mr. Watts to this e-mail?
A. The response you see on the same
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Q. If you look at his e-mail does it appear as he's responding to your criticism of the organization?

MR. TUTTLE: Object to form.

THE WITNESS: No.

BY MR. HABER:

Q. When you say in your e-mail of January 30, 2004, "to ensure adequate delegation, balance, and ownership," what message were you trying to convey to the recipients of this e-mail?

A. I was trying to convey just that I was comfortable with putting forward John Darley and Curtis Frasier that I felt it important that there was the right distance also to avoid any perception of conflict of interest on a very sensitive issue.

Q. You wrote again to Mr. Watts, again, a cc to a number of people who are recipients on these e-mails, "I note that no change has been made based on my comments. At least had expected a discussion at CMD before this was issued."
WALTER VAN DE VIJVER

Why were you expecting a
discussion at CMD on the issue?
A. Well, I expect that if I would
make comments to my colleagues that at least
there would be a response.
Q. Did you ever have a response from
Mr. Watts?
A. No.
Q. Did you ever get a response from
Ms. Boynton?
A. No.
Q. Did any other member of the CMD
respond to your comments?
A. No, not that I recollect.
Q. And throughout Project Rockford
the organizational structure of Rockford
remained as depicted in the org chart that's
attached to Exhibit 42?
MR. MORSE: Objection to form.
THE WITNESS: Yes.

BY MR. HABER:
Q. Now, in the second sentence in the
e-mail of February 2nd that you sent to
Mr. Watts you said, "In order to 'contain' the
WALTER VAN DE VIJVER

overall senior management on this within EP."

What did you mean by putting the word contain into quotes?

A. That I wanted to make sure we had a clear focal point accountability in E&P. And John Darley had convinced me that he was able to take the task and he would utilize Curtis whenever he was not available, so I was perfectly happy with them working together as they felt comfortable.

MR. HABER: We have to change the tape, so if you can just hang around probably two or three minutes we can try and get this done.

MR. DOWD: Thank you.

THE VIDEOGRAPHER: This marks the end of tape one in Volume III of Mr. Van de Vijver. We are going off the record. The time is 11:50 a.m.

(A brief recess was taken.)

THE VIDEOGRAPHER: This marks the beginning of tape two, Volume III in the deposition of Mr. Van de Vijver. We are back on the record. The time is 11:56 a.m.
WALTER VAN DE VIJVER

BY MR. HABER:

Q. Mr. Van de Vijver, if you could just look at the org chart on Exhibit 42 for one second. The top of the organization says PX and then Watts/Loader. Do you see that?

A. Yes.

Q. What is PX?

A. PX is a reference indicator of Adrian Loader.

Q. What does that stand for?

A. Group planning and public affairs, if I'm correct.

Q. So the organization chart shows that everyone underneath Mr. Watts and Mr. Loader report up to them and then they are the focal point that reports to the CMD?

A. Uh-huh.

Q. I'm sorry. You have to verbalize an answer?

A. Yes. Yes.

Q. Okay. Do you know if Anton Barendregt had ever commented on the note for -- the note to the CMD that was submitted on December 8th?