

BRENT COON & ASSOCIATES
LAW FIRM, P.C.

Principle Office:

Beaumont, Texas
3550 Fannin
409.835.2666
Managing Atty
Brent Coon *§

February 13, 2007

Houston, Texas
713.224.5949
Pasadena, Texas
713.920.0000
Managing Atty
Lou Thompson Black

Mr. Stephen Fernelius
FULBRIGHT & JAWORSKI
1301 McKinney Street, Ste 5100
Houston, TX 77010-3031

VIA EMAIL

Dallas, Texas
214.890.0460
Managing Atty
Dennis Weitzel *§

RE: Cause No. 05-CV0337-A, In Re: B.P. Amoco Explosion March 23, 2005,
Coordinated Discovery Proceedings; In the 212th Judicial District Court of
Galveston County, Texas.

Houston, Texas
713.225.1682
Corpus Christi, Texas
361.883.5300
Managing Atty
Arthur J. Gonzalez

Cause No. 05CV0337; Miguel Arenazas and Elizabeth Ramon vs. B.P. Amoco
Chemical Company, et al; In the 212th Judicial District Court of Galveston
County, Texas.

San Francisco, California
415.489.7420
Managing Atty
Cheryl L. White

Dear Steve;

Enclosed please find the following document:

Jackson, Mississippi
601.714.5126
Managing Atty
Alice Coleman

*Plaintiffs' Notice of Intention to Take the Oral and Videotaped Deposition
of Lord John Browne of Madingley with Subpoena Duces Tecum.*

Cleveland, Ohio
216.241.1872
Managing Atty
Christopher J. Hickey

Should you have any questions or concerns relative to this matter,
please do not hesitate in contacting this office.

New Orleans, Louisiana
504.566.1704
Managing Atty
Julie Jacobs

Yours very truly,

Esther Espino
Administrative Legal Assistant to
Arthur J. González

St. Louis, Missouri
314.646.0644
Managing Atty
Robert Ramsey

Philadelphia, Pennsylvania
215.564.9245
Managing Atty
Brian Ketterer

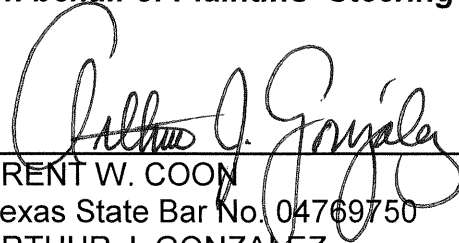
:rece
Enclosures
cc: Via Email
Defense Counsel
Plaintiffs' Attorneys

* Certified Civil Trial Law
§ Certified Personal Injury Trial Law

and on behalf of the Plaintiffs' Coordinated Discovery Committee, do hereby give notice that they intend to take the deposition of Lord John Browne of Madingley. The deposition will be held at the offices of BP p.l.c., 1 St. James Square, London, SW1Y4PD, Telephone +44 (0) 20 7496 4000, or at some other venue mutually agreeable to the parties, on Friday, February 23., 2007, beginning at 9:00 a.m. and continuing thereafter from day to day until completed, before a certified reporter or other person duly authorized to administer such oaths. Such deposition is to be used at the trial of this cause. Said deposition may be videotaped.

Respectfully submitted,

On behalf of Plaintiffs' Steering Committee



BRENT W. COON
Texas State Bar No. 04769750
ARTHUR J. GONZALEZ
Texas State Bar No. 08124050
300 Fannin, Ste 200
Houston, Texas 77002
Telephone: 713.225.1682
Telecopier: 713.225.1785

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel of record, pursuant to Rules 21 and 21a of the Texas Rules of Civil Procedure, via U.S. Mail, certified, return receipt requested, and/or facsimile, email, and/or hand delivery, on the 12TH day of February, 2007



ARTHUR J. GONZALEZ

SUBPOENA DUCES TECUM

Pursuant to the Texas Rules of Civil Procedure, you are compelled to produce the items or things described herein, that are within your possession, custody or control, for inspection and photocopying at the date and time indicated in the foregoing Notice of Intention to Take Oral/Videotaped Deposition.

By agreement of the parties thirty (30) day notice of subpoena has been waived.

Definitions

"DOCUMENT" refers to each and every written, typed, printed, recorded, transcribed, taped, filmed, or graphic material, however produced or reproduced, including copies of originals if originals are not in existence or not available, wherever located. The term "DOCUMENT" includes all written or graphic material of every kind and nature, including, but not limited to, testimony and exhibits, memoranda, interoffice memoranda, intraoffice memoranda, correspondence, letters, proposals, reports (including drafts, preliminary, intermediate, and final reports), surveys, analyses, studies (including economic and market studies), test results, summaries, comparisons, tabulations, charts, books, pamphlets, photographs, slides, videotapes, maps, charts, books, pamphlets, photographs, slides, videotapes, maps, charts, graphs, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data, computer files, computer tapes, computer inputs, computer financial statements, canceled checks, check stubs, budgets, work papers, engineering diagrams including one-line diagrams),m radiographic studies, mechanical and electrical recordings, telephone and telegraphic communications, speeches, scientific tests or results, medical records, medical bills, learned treatises, contracts, agreements, and portions or parts thereof in whatever form, safety rules an and regulations safety guidelines, safety manuals, directives, corporate charters, consolidated tax returns, and all other records, written, electrical, mechanical or otherwise, and drafts of any of the above and any and all other such material not included n the foregoing relating in any way to the subject matter specified.

"DOCUMENT" includes copies of documents, where originals are not in your possession, custody or control.

"DOCUMENT" includes every non-identical copy of a document which contains handwritten or other notations, which otherwise does not duplicate the original or any other copy.

"DOCUMENT" also includes any attachments or appendices of any document.

"INCIDENT" refers to the explosions having occurred at the BP Amoco Texas City Refinery on or about March 23, 2005.

"BP" refers to BP P.L.C. and all of its subsidiaries, including but not limited to BP North America, BP/Amoco, and the BP Amoco Texas City Refinery.

Documents to be Produced

1. All documents, notes, diaries, in addition to and documents/communications stored and/or transmitted electronically of which deponent is or has been a custodian that relate to the March 23, 2005 incident including without limitation all such information related to:
 - a. The cause of the incident;
 - b. Investigation of the incident, by any person, committee, or agency;
 - c. BP's response to the incident;
 - d. The deponent's opinion regarding the cause of the incident;
 - e. The deponent's opinion regarding the investigation of the incident;
 - f. The deponent's opinion of BP's response to the incident;
 - g. Where others have communicated to the deponent regarding the cause, investigation, or BP's response to the incident, all copies of same; and
 - h. Compliance with and knowledge of guidelines, rules, laws and policies and procedures relating to process safety, if applicable.
2. All documents, notes, charts, video and/or audio tapes, and electronically stored or transmitted information, or other tangible or computerized items reviewed by deponent in preparation for deposition. Please bring the actual copies of such items reviewed to said deposition.
3. All documents, notes, charts, video and/or audio tapes, electronically stored or transmitted information, or other tangible or computerized items reviewed by deponent in preparation for any statement given by deponent to any investigating person, committee or agency (for example only, the BP committee investigating the incident).
4. All documents that relate to the destruction or retention of documents and electronically stored information received by deponent after the incident.
5. All documents deponent referenced in prior statements given to any investigating

person, committee or agency (for example only, the BP committee investigating the incident).

6. All documents, deponent referenced in prior statements given to any investigating person, committee or agency (for example only, the BP committee investigating the incident.).
7. All documents, notes, diaries, in addition to documents/communications stored and/or transmitted electronically of which deponent is or has been a custodian that relate to the accountabilities investigation being conducted into BP management, and their roles and responsibilities in this incident.
8. All documents, notes, diaries, in addition, documents/communications stored and/or transmitted electronically of which deponent is or has been a custodian that relate to the study and report done at the Veba Aral facilities in Germany by A.T. Kearney, on or about 2002.
9. Please produce a true and correct copy of the "Turtle Bible."
10. Please produce true and correct copies of all transcripts, videos, DVD's or other electronic media, containing any and all speeches, interviews and press conferences, inclusive of question and answer sessions, given by deponent in response to the release of The Baker Panel Report and the Bonse Report, also known as the "Management Accountability Project – Texas City Isomerization Explosion Final Report."