

MR. CAMERON, EXAM. BY MR. MERRICK

1 to it getting to this stage that we see in this memo?

2 A. I can't honestly tell you if someone approached
3 before that, Gerald Phillips or someone else said, "Look,
4 can we have an advance on some of that money to get the
5 project going?" I can't honestly tell you today that it
6 was before this date or after the date. I don't know.
7 Or Marvin Pelley, I can't tell you that.

8 Q. All right. Just following through the documents
9 that we do have before us, if you flip over to the next
10 page, it's a memorandum from Elizabeth Cuddihy to --

11 A. Which one?

12 Q. The next page, stamped page 21.

13 A. Okay.

14 Q. It's that memorandum.

15 A. Uh-huh.

16 Q. Elizabeth to Tom Merriam. The only reason I note
17 this is that it's several days later. It must have
18 followed the meeting in Toronto on January the 17th that
19 was referred to.

20 A. Uh-huh.

21 Q. And it refers to the maximum interim financing to be
22 provided would be \$4 million.

23 A. Uh-huh. And she's referring, in her lead-in
24 paragraph -- she says, "This will confirm your
25 instructions to me on January the 21st wherein you