

MR. CAMERON, EXAM. BY MR. MERRICK

1 Q. Do you recall the written opinion from MCR?

2 A. No, I don't recall that right now.

3 Q. Do you remember that there was a written opinion?

4 A. No.

5 Q. Do you dispute the fact that you had to go to --
6 that your department had to go to MCR because your own
7 staff refused to do the documents?

8 A. I think you're leading -- your leading down a road
9 that you want to go to. I think --

10 Q. I'm reading --

11 A. -- the bottom --

12 Q. -- the document from your own staff.

13 A. Well, the bottom line is that that company did the
14 whole deal. And there was documents five feet thick.
15 And the discussion in our department, we don't have time,
16 with all the other deals we're doing, we don't have time
17 to just do this one and nothing else. We have to go
18 outside for some outside advice.

19 And, Mr. Merrick, that's not unusual either. It's
20 not the first time it happened and it's not the last time
21 it will happen.

22 Q. I'm not talking about going to outside legal advice,
23 Mr. Cameron. I'm talking about the fact that your staff
24 advised you that you couldn't do it. They refused to
25 draft the documents, so outside legal counsel were