

## Summerson Deposition Outline

### I. Summerson (CFO) Communication With Dedlock (CEO)

#### A. Goals

- *Communicated all material financial events to Dedlock*
- *Did not discuss the Well project with Dedlock*
- *No knowledge of Dedlock discussing Well project with Board of Directors*
- *[Possible] Did not discuss any non-financial matters with Dedlock*
- *[Alternative]: Identify all non-financial subjects discussed with Dedlock*

#### B. Job Overlap with Dedlock

1. You became CFO in 1997?
2. Was that the first time you had worked with Mr. Dedlock?
  - a) This is a copy of a document entitled CFO job description?
    - (1) You are familiar with this document?
    - (2) And it accurately describes your responsibilities as CFO?
    - (3) On the third bullet from the bottom it says “report all material events to CEO”
    - (4) What did you understand that to mean?
      - (a) That included all important financial matters?
      - (b) *[If no:]* what is an example of an important financial matter you would not report to the CEO
  - b) Did you work with him on any other type of matters?
    - (1) *[If yes:]* What were they?
    - (2) Is that all of them?
  - c) You discussed those matters over email?
    - (1) Did you also discuss in person?
    - (2) And by phone?

(3) Any other way?

3. Update email

To:  Cc Bcc

Subject: **Financial update** Priority ▾

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Leicester,

Three things I want to discuss with you at this afternoon's meeting:

- Q3 reports
- Current status of all financial-related projects
- Auditor meeting

On point 2, this will mostly be an update of what we covered last month, but there are a few additions, I'd like you to direct

[Tab 8]

- a) This is an e-mail you sent to Mr. Dedlock
- b) The second bullet refers to “Current status of all financial-related projects”?
- c) Was this a regular topic at your meetings with Mr. Dedlock?

C. Projects They Worked on Together

D. No Knowledge of Well Project