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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN			1	INDEX	
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KATHLEEN McHUGH and DEANNA SCHNEIDER, Individually and on behalf of all			3	WITNESS AND EXAMINATION OF A SALVE	PAG
persons similarly situated, Plaintiffs,		4	4	DEANNA SCHNEIDER	
-vsvs- Case No. 11-CV-724			5	By Mr. Bianchi5	
MADISON-KIPP CORPORATION,			6	By Mr. White	
CONTINENTAL CASUALTY COMPANY,			7	By Ms. Kreil	
UNITED STATES FIRE INSURANCE COMPANY and ABC INSURANCE			8	By Mr. Bianchi42	
COMPANIES 1-50,			9	By Mr. White	
Defendants,			10	en e	ξ3 · · · ·
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MADISON-KIPP CORPORATION, Which will be suffered to the suffer			12		
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Cross-Claimant,		÷	14		. Th
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COLUMBIA CASUALTY COMPANY, and UNITED STATES FIRE INSURANCE			17		
COMPANY, Cross-Claim Defendants,			18		
Closs-Claim Defendants,			19	n de la companya de La companya de la co	٤'
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DEANNA SCHNEIDER			22	ing the control of the section of the control of th	
Madison, Wisconsin		3 11	23	er a stelle visit i la Archite de la germania.	
February 22, 2013 11:00 a.m. to 11:57 a.m.		51.	24	The state of the s	
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PHYLLIS KAPARIS, RPR				A THE COLORS OF THE ACTION OF THE COLORS	
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1	PROCEEDINGS	1		was your job?
2	DEANNA SCHNEIDER, called as a witness	2	Α	I did youth development education.
3	herein by the Defendants, after having been first	3	Q	And how long have you been living in Madison?
4	duly sworn, was examined and testified as	4	À	I moved here in 1991.
5	follows:	5	Q	And have you always lived on the east side of
6	EXAMINATION 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	6	~	A 4 - 4! 0
7	BY MR. BIANCHI:	7	Α	No.
8	Q Good morning.	8	Q	Where else have you lived in Madison?
9	A Good morning.	9	A	I lived downtown on right off of campus when I
10	Q Can you please state and spell your name for the	10	А	first moved here.
11	record?	11	0	When did you first move to the east side?
12		12	Q	
13	A Sure. Deanna Schneider, D-E-A-N-N-A,	13	Α	Depends on what you define the east side as. I
1	S-C-H-N-E-I-D-E-R.	1 .		lived on Pinckney Street in 2000 let's see,
14 15	Q And what is your home address?	14	0	what was that? I can't give you an exact date.
1	A 150 South Marquette Street.	15	Q	That's fine.
16	Q And have you ever been deposed before?	16	Α	Late 90's, early 2000's I moved to Pinckney
17	A No.	17	~	Street, and also lived on Willy Street.
18	Q I'm just going to give you a couple ground rules	18	Q	Who lives in the home at 150 Marquette with you?
19	to make this go quick and easy for everyone.	19	A	My son does part-time.
20	Phyllis, the court reporter here, is taking down	20	Q	And what do you mean by part-time?
21	everything that we say, so we need all verbal	21	Α	He's with me four days a week.
22	answers, "yes" and "no" and responses as opposed	22	Q	You purchased the home in 1997?
23	to head nodding and such. And it's easiest for	23	A	Correct.
24	her to take down what we say if we don't talk	24	Q	And have you lived in the home continuously since
25	over each other. So I will work very hard at not	25		1997?
	D C	1		_
	Page 6			Page 8
1	-	1		
	cutting off any of your answers. And vice-versa,	1	Α	I have.
2	cutting off any of your answers. And vice-versa, even if you know the answer to my question before	1 2		I have. And besides your son, has anyone else lived with
2	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay?	1 2 3	A Q	I have. And besides your son, has anyone else lived with you in the home at any point in time?
2 3 4	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay? A Okay.	1 2 3 4	Α	I have. And besides your son, has anyone else lived with you in the home at any point in time? Yes, when I first bought the house, I had a
2 3 4 5	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay? A Okay. Q What is your educational background?	1 2 3 4 5	A Q	I have. And besides your son, has anyone else lived with you in the home at any point in time? Yes, when I first bought the house, I had a roommate. And I had a summer renter for one
2 3 4 5 6	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay? A Okay. Q What is your educational background? A I have a bachelor's degree in art history and	1 2 3 4	A Q	I have. And besides your son, has anyone else lived with you in the home at any point in time? Yes, when I first bought the house, I had a roommate. And I had a summer renter for one summer. And then I was married, so I had a
2 3 4 5 6 7	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay? A Okay. Q What is your educational background? A I have a bachelor's degree in art history and African cultural studies, and a few credits	1 2 3 4 5 6 7	A Q A	I have. And besides your son, has anyone else lived with you in the home at any point in time? Yes, when I first bought the house, I had a roommate. And I had a summer renter for one summer. And then I was married, so I had a husband that lived with me.
2 3 4 5 6 7 8	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay? A Okay. Q What is your educational background? A I have a bachelor's degree in art history and African cultural studies, and a few credits towards a master's in guidance and counseling.	1 2 3 4 5 6 7 8	A Q A	I have. And besides your son, has anyone else lived with you in the home at any point in time? Yes, when I first bought the house, I had a roommate. And I had a summer renter for one summer. And then I was married, so I had a husband that lived with me. Who was the roommate?
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2 3 4 5 6 7 8 9	cutting off any of your answers. And vice-versa, even if you know the answer to my question before I get there, just let me finish. Okay? A Okay. Q What is your educational background? A I have a bachelor's degree in art history and African cultural studies, and a few credits towards a master's in guidance and counseling. Q And when did you complete your undergrad degree? A I believe it was '93, December of '93.	1 2 3 4 5 6 7 8 9	A Q A Q A Q	I have. And besides your son, has anyone else lived with you in the home at any point in time? Yes, when I first bought the house, I had a roommate. And I had a summer renter for one summer. And then I was married, so I had a husband that lived with me. Who was the roommate? Her name was Lauren Kelly. How long did she live with you; do you recall?
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2/22/13

Deposition of Deanna Schneider

		Page 9			Page 11
1		2, 3, 4, 5 and 6, and just confirm that those are	1		still using it as a recording studio after he
2		your discovery responses to us.	2		moved out.
3		MR. MANZKE: Yes, they are.	3	Q	And when was that, that you remember?
4	В	Y MR. BIANCHI:	4	À	That he moved out?
5	Q	Ms. Schneider, I'm going to have you look at	5	Q	Sorry. Yeah, when you first learned about the
6	`	Exhibit 1. Look at the document that is the	6	`	potential contamination, so he stopped using it?
7		property search result, Pages 2 and 3. Can you	7	Α	Well, we had a meeting with DNR in the fall
8		tell me if you see anything incorrect on that	8		of 2010 and with Kipp and with DNR, and that's
9		document?	9		the point where they told me they thought that
10	Α		10		there could be.
11		house.	11	Q	And when was your son born?
12	Q	When was that?	12	À	2003.
13	À	I don't have an exact date. You would have to	13	Q	You said that's when you stopped having bands
14		look it up.	14	`	come in.
15	·Q	Do you know approximate?	15	Α	Yeah, primarily for the noise.
16	À	Early 2000's.	16	Q	Sure. And is your husband or your ex-husband,
17	Q	And it was the entire roof?	17	`	I apologize your ex-husband a professional
18	A	Yes.	18		musician?
19	Q	Have you done any other kind of construction on	19	. A	Again, define professional. He does make some
20	`	the home since your purchase?	20		money doing it, but he has another job as well.
21	Α	Define construction.	21	Q	What's his other job?
22	Q	Sure. Any kind of, you know, start with like	22	À	He drives cab.
23		major remodeling, any additions to the home?	23	Q	What do you store in the basement?
24	· · · A	No additions.	24	A	Bunch of fabric and my sewing machine, and our
25	Q	Any major remodeling where you had to remove	25		camping equipment, our bikes live down there, you
	······				
		Page 10			Page 12
					raye 12
1		walls?	1		know, my tools.
2	A	walls? I did remodel the kitchen.	2	Q	know, my tools. Any kind of paint?
2 3	Q	walls? I did remodel the kitchen. Did that involve removing walls?	2 3	Α	know, my tools. Any kind of paint? Yeah, there's some paint stored down there.
2 3 4		walls? I did remodel the kitchen. Did that involve removing walls? It involved removing a dropped ceiling and	2 3 4	A Q	know, my tools. Any kind of paint? Yeah, there's some paint stored down there. Do you know, indoor or outdoor paint?
2 3 4 5	Q	walls? I did remodel the kitchen. Did that involve removing walls? It involved removing a dropped ceiling and opening up part of a wall to create a	2 3 4 5	A Q A	know, my tools. Any kind of paint? Yeah, there's some paint stored down there. Do you know, indoor or outdoor paint? Indoor paint.
2 3 4 5 6	Q A	walls? I did remodel the kitchen. Did that involve removing walls? It involved removing a dropped ceiling and opening up part of a wall to create a pass-through.	2 3 4 5 6	A Q A Q	know, my tools. Any kind of paint? Yeah, there's some paint stored down there. Do you know, indoor or outdoor paint? Indoor paint. Any kind of like paint thinner?
2 3 4 5 6 7	Q	walls? I did remodel the kitchen. Did that involve removing walls? It involved removing a dropped ceiling and opening up part of a wall to create a pass-through. How about the basement, any remodeling in the	2 3 4 5 6 7	A Q A	know, my tools. Any kind of paint? Yeah, there's some paint stored down there. Do you know, indoor or outdoor paint? Indoor paint. Any kind of like paint thinner? I don't think so. I always used water-based
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1 Q And aside from stopping to use it as a recording	part of my house, and he recommended that we
2 studio, has your use of the basement changed at	2 limit our time in the basement and that we try to
3 all since the fall of 2010?	make sure the rest of the house was ventilated as
4 A Yeah, I try to spend as little time there as	4 well as possible.
5 possible. I used to do a lot more projects in	5 Q So did he tell you that the home was unsafe to
6 the basement, using the workbench. I used to	6 live in?
7 just do more of that sort of stuff, and I don't	7 A I don't think he went so far as to say the home
8 2 1 1 4 1 do it as much anymore. The balls as	8 is unsafe to live in. But we were talking about
9 Q And there is a what I refer to as a mitigation	9 my concerns, and he did say that he understood
system installed in the basement now. Is that	10 them, and that this is you know, this is the
a 11 correct? The first along the conduction of the contract o	reality of the situation, that if the chemicals
12 A I have two, yes.	leach into your home through any that what the
13 Q Do you remember when those were installed?	13 chemicals want to do is find a way in, and if
14 A The first one was installed in the spring	14 they find a way in, then I'm being exposed.
of 2011. And the second one was installed later	15 Q Have you since you purchased the home in 1997
16 a trade than that, I think probably sometime in the	16 attempted to sell it at all?
17 serve summer of 2011. The server of the s	17 A No. Alexander of the second of the seco
18 Q And since getting the mitigation systems, did	18 Q Have you ever contacted a realtor about selling
19 your use go back to the way that you normally	19 dain mit? In bas/dates garas a sovered of the seven
20 A maked your basement? A padef vocate	20 A Yes. Threedmakes seen, in account of the control of the
21 A No. Standard and A 4	21 Q When was that? and retained in the control of
22 Q Why not? for 20 does also	22 xmA maybe 2000: 7 x mm m m m m m
23 A I still don't feel like I'm completely safe down	23 Q And how come you decided not to?
24 24 25 Continued there. I have had both my mitigation systems	24 A It was more of it was before we knew anything
25 fail since they were installed and have to be	25 about any of this stuff going on. It had nothing
Page 1/	Page 16
Page 14	Page 16
1 reinstalled. And, you know, in one of those	1 to do with that. It was just sort of dreaming
reinstalled. And, you know, in one of those instances I came home to the smell of burning	1 to do with that. It was just sort of dreaming 2 bigger, and realized that we couldn't really
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1	process or li	ke due diligence did you do before	1	Α	I don't recall.
2		ed the home regarding the property?	2	Q	Do you remember doing any research about
3		ng with a realtor. And I had a home	3	`	Madison-Kipp at the time?
4		one. And I had a WHEDA loan, so	4	Α	No, I did not do any.
5		y do in addition to, you know, what	5	Q	Did you consider the impact of living right next
6		as doing and what I was doing.	6	4	to a factory would have on the value of the home?
7		know the recall the realtor's name?	7	Α	I considered it from the perspective of the
8	A Sue Peterso		8		noise. I mean, I could hear that it's a factory
9		k at any other homes?	9		that does something. You know, I could hear that
10	<u>-</u>	en e	10		there was noise coming from there. And I
11		different area?	11		considered it from the fact that looking out my
12		al area, near east side.	12		back windows wasn't a beautiful view. I didn't
13	_	e looking to stay in the near east	13		consider any environmental issues because I
14	side?		14		didn't think that I would need to consider that
15	A Yes.		15		because I thought environmental law and zoning
16	Q When you p	ourchased the home, did you receive any	16		regulations would take care of all of that.
17		environmental disclosures?	17	Q	And did you believe that the price of that home
18		mental disclosures. There was a crack	18	`	was going to be less because it was abutted next
19		ation that was going to be fixed with	19		to a factory than a similar home that wasn't
20		row, so I had an information sheet	20		right next to a factory?
21	about that.		21	A	That made sense to me, sure.
22	Q And was th	at crack fixed?	22	Q	So you thought about that at the time.
23	A Yes.		23	À	Sure. I mean, that I'm you know, I'm not
24	Q Have you h	ad any other foundation issues since?	24		living next to a park. It's not a beautiful
25	A No.	The control of the state of the	25		thing to look at.
3					
		Page 18			Page 20
,	0 11/1	_		_	
1		first purchased the home, do you	1	Q	So did you have any idea about any kind of
3		e price? I think you can look at	2	8 9	pollution issues, whether the ones that are
4		chibit 1. 100 properties to the second secon	3		involved in this case or any other kind of air
5		averigazo, a cina como	5	1 31 245 A	pollution issues, before you purchased the home?
6		s what it says; is that correct?	6		No. 2 and a continuous final paragraph
7		was accurate, 75,300, yes. at the time you took out a mortgage?	7		And I think you said you first became aware of
8	•	•	8		the potential contamination issues involving Kipp
9		all how much the mortgage was for?	9	A	I first become every of the vener intrusion
10	A I think 60,0	0,0	10	Α	I first became aware of the vapor intrusion issues in the fall of 2010.
11			11	0	
12		you purchased the home, did you talk neighbors?	12	Q	When did you first become aware of any kind of
13		<u> </u>	13	A	pollution issues involving Kipp?
14		did you first become aware that the	14	Α	In 2002 Kipp sent me a letter saying that they
15	•	=	15		wanted to do some testing on my property because
16		s abutted to Kipp's factory? Id see that it was when I bought the	16	^	there might have been some soil issues.
17	•	_	17	Q	And what did you do after receiving that letter?
18		I mean, when you before you got	18	Α	I called them and talked to them about it and agreed to the testing.
19		· · · · · · · · · · · · · · · · · · ·	19	0	
20		did the realtor say anything about	20	Q	
21	it or A No.		21	- 1	someone at Kipp?
22		until van abraiaally at the	22	. A	I believe the DNR might have been involved at
23		until you physically were at the			that point, but I don't recall ever having talked
24	nouse that you	ou saw that Kipp was there?	23 24	^	to them in the initial testing.
. /4	A KIONI		1 44	Q	Did you seek out some your own kind of
\$	_	constant about 40	1		
25	_	any questions about it?	25		environmental scientist or anybody at that time?

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Page 21			Page 23
1 A Not at that time.	1	A	I only have one e-mail account that I use on a
2 Q Have you since?	2		regular basis.
3 A Yes. Walking a control of	3	O	Did you check any other forms of media besides
4 Q Who?	4		e-mail for any kind of communications about the
5 See A Real Ve talked to specialists at UW Extension,	5		issues at Kipp?
6 because I work for UW Extension, and we have	6	Α	No. 1 - 1 - Ave and a set
7 solid and hazardous waste specialists that I've	7	Q	Is there any kind of social media page that
8 spoken to: The first transfer of the second secon	8		you've run involving Kipp?
9 Que Do you know their names?	9	Α	We had a facebook page that posted general news
10 A I can't remember it. It might come to me.	10		information about what was going on with the Kipp
11 Q Have you ever e-mailed with those people?	11		testing so that people would know, but that has
12 randA Not that I recall? average over a lease	12		not been active since the lawsuit started.
13 Q Have you e-mailed with anybody other than your	13	Q	And you haven't had any other social media pages
14 and attorneys about the Madison-Kipp issues?	14		regarding Kipp?
15. Histor Athan Yes. Accompany to the risk arm (Section 2)	15	Α	Dedicated to Kipp, no.
Q Not including the other class members, anybody	16	Q	Or on which that you've posted things about Kipp?
17 and tonoutside of them? to be being and before to	17	À	Probably. I mean, I met our lawyers through a
1892 Artin My family. The factor of the second of the seco	18		social media page, I guess you would call it,
19 Q And do you still have those e-mails?	19		comments on a news article.
20 A No. I gave all the e-mails that I still have to	20	\mathbf{Q}	And do you comment on other news articles?
the attorneys to give to you guys.	21	Α	Not much anymore.
22 Q And any e-mails since?	22	Q	But you did before?
23 MART No. 14 Comment of the contract of the	23	Α	I have.
24 Q How about with the class members?	24	1 - Q	Did you do anything to keep track of which
25 A There's been some e-mails with class members,	25		articles you commented on?
T		*************	
Page 22			Page 24
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1 to boyes, respect to the contract of the con	l		el North edither there is the property of
1 Quantum And not including with your attorneys cc'd on	2		No. a week the same and the same to the world you keep track of your user names for
1 Q And not including with your attorneys cc'd on 3 them? A Yeah, I don't think I think there's been some 5 requesting information, you know, like requesting	2 3	Q ·	No. Would you keep track of your user names for different forums that you commented on?
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Page 25	Page 27
1 Q At that time did you consider hiring someone to	and that the levels are very much above the
2 do your own research on it?	2 standard on Kipp's property and that there's a
3 A I don't have the financial means to do that.	3 way for them to get from Kipp's property to my
4 Q And at that time did you talk to people at the UW	4 property, I think it's dangerous.
5 system about the issues, too?	5 Q Do you know, are you aware of any remediation
6 A I don't think I did then. I think it wasn't	6 that Kipp is doing on its property to prevent
7 until later that I did that.	7 anything going to your property?
8 Q And what do you remember when you first would	8 A Kipp has done remediation, I know that, but it's
9 have talked to people in the UW system about it?	9 still continuing to get onto my property.
10 A I can't give you a date.	10 Q And why is that? Why do you say it's still
11 Q Do you remember those conversations, like what	continuing to get onto your property?
12 they shared with you?	12 A Because the testing has shown over the years that
13 A He basically sent me to the EPA website to the	13 there was a point where there wasn't vapor on my
data sheets there about the chemical that we were	property, and now there is. So clearly it's
15 dealing with the American section is a second section.	15 coming onto my property.
16 Q Did he say anything about the EPA standards?	16 Q Right. And since then, Kipp has been doing
17 A I know that we talked about the EPA standards,	17 remediation. So do you know I'm just curious
yeah, but I can't remember exactly what he said.	18 if you know since they've been doing that
But that I should be comparing my results to the	remediation whether it's still continuing to come
20 mass are EPA standards and making decisions based off of	onto your property?
21 / 394 that. 2 / 3 / 3 / 3 / 3 / 3 / 3 / 3 / 3 / 3 /	A Well, I know that it's not gone from Kipp's
22 Q And did you do that?	property, so I would assume that it's still
23 and A of Interms of the soil vapor contamination, yeah.	continuing to move. I can't you know, my
24 Q So you relied on the EPA standards to judge the	property hasn't been tested again since they've
25 cardanger? The state of the	done remediation, so I can't tell you for
Page 26	Page 28
1 A Well, I relied on the levels that the DNR are	1 100 percent sure, but I know it's not gone on
2 using, in conjunction with what the information	2 Kipp's property.
2 using, in conjunction with what the information 3 and am is on the EPA data sheets and their standards.	2 Kipp's property. 3 Q And so you don't know the levels that are at your
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1 Qr - You still believe that? And the College of t	1 and moralit that early on. In great the control of the
2 A Caracterist won't uptake into plants?	2 Q So when you first learned of the vapor issues in
3 O Q of That it will? In the compagnition of	3 2010, did you contact any of your neighbors and
4 A I don't say here that I believe that. I say I'd	4 start talking to them about it?
5 A secrather err on the side caution.	5 A Well, we learned about it as a group, so there
6 Q And what do you mean by that? Do you recall?	6 was there were at the first meeting I think
7 A It means that I would rather not take any chance	7 there were four houses, four households that
8 control that the experts are wrong: 4 controls and the experts are wrong.	learned about it together. So we certainly
9 Q But you're not aware of any other documents or	9 Million talked to each other at that point.
10 anything that say that the experts are wrong?	10 Q Did you talk to anybody who wasn't at the
11 A No, I'm not. why the happed probabilities	11 by a fameeting? The end of the second of
12 Q So at the time that you were writing this, were	12 A I don't think we talked to anybody else until
13 you in communication with the DNR about the	13 after there were newspaper articles and TV
14 testing? All a stream land a regular	14 reports about it.
15 A The DNR was involved in the back and forth, you	15 Q And did you contact any of the media outlets
16 know, the written communication that we had.	16 before they put those articles up?
17 Q And did you ever suggest that, you know, you	17 A lead I did not.
18 disagreed with their what you're noting here	18 Q and Do you know who did?
19 is their result, you know, that the levels were	19 at Act of do not, a frame we add a way from the frame.
20 below their action level? The factor of the	20 Q I know earlier you had mentioned that you were on
21 A I'm guessing that I because my personal action	21 a forum, and that's how you were contacted by
level is zero, I probably did say I want I	22 your attorneys?
23 want it cleaned up in my yard.	23 A Uh-huh. That was from one I don't remember if
Ya.	24 a dit was the TV interview stuff or the newspaper
	25 article. I think it was the newspaper article
second page, you in a discussion with someone	article. I tillik it was the newspaper article
Page 30	Page 32
1 were pointing them to some links.	1 that was done about having the mitigation systems
1 were pointing them to some links. ren (1) 2 A Uh-huh.	1 see A that was done about having the mitigation systems 2 see that put in A that additional declaration is a second as the sec
2 A Uh-huh. sepagara depairs	
2 A Uh-huh. Seinstein Seit S	2 are the put in. A first of the contraction of the
2 A Uh-huh. 3 Q Do you remember what those documents were linking	2 are the put in. A first of the many expension of the control of the second of the control of the second of the control of th
2 A Uh-huh. Springer of Gelid 3 Do you remember what those documents were linking 4 to? The street and the street springer 5 A I don't.	2 Quark And it's your understanding that any e-mails that 4 you would have had with other class members prior 5 to the lawsuit you just deleted?
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		Page 33			Page 35
	0	-	1		-
$\frac{1}{2}$	Q	•	1	Α	It could have been, or it could have been the
2		with other class members like that one about	2	_	extension guy. I'm not sure.
3		depositions?	3	Q	And similar questions with Mr. Nehlslowe, in
4	Α	2	4		general how many times would you say you've
5		people ask me just face-to-face if I've done my	5		spoken to him personally?
6		deposition yet.	6	Α	Most of my conversations with him were at
7	Q	Any other kind of conversations with other class	7		meetings that we had. There was the conversation
8		members about the deposition?	8		that we had in my driveway where he talked about
9	A	No. 1 Comment of the Care Comment	9		staying out of the basement, and a couple of
10	a Q	Face-to-face either?	10		phone calls: 1997 by the state of the state
11	Α	of No. Server of the way a relative to the server of the	11	Q	And is there anything further that he told you?
12		MR. BIANCHI: I'm going to take a	12		I know he said about staying out of the basement.
13	1.089 A	quick break, just talk with my colleague here.	13		Anything further you remember that he told you
14		## 1.00 THE WITNESS: Okay.	14		specifically about the safety of your home or
15		(A recess was taken.)	15		soil? he per term and the projety appropriate in the
16	: B	Y MR. BIANCHI: And goods of preciously	16	Α	He told me I remember him telling me that if
17		I have a couple more questions. In looking at	17		Kipp would not pay for mitigation systems that he
18		Exhibit 7, Page 2, I know you noted that you	18		would argue for the state to pay for them because
19		believed that this was related just to the	19		he felt that they were extremely necessary in
20		soil. So would you be surprised to know that one	20		this case. The Association of the second
21	an model	of those links if I told you that one of those	21	O	Did he tell you it was unsafe to live in your
22			22		c home?
23		intrusion?	23	Α	I don't know that he ever used that terminology.
24	: A		24	Q	What terminology did he use?
25	Q	So you don't recall ever reading a soil vapor	25	•	That I had cause for concern, that clearly levels
		as you were come of a reading a son taper			
j të		Page 34			Page 36
1.5		intrusion document back around 2004?	1		under my house were above what they would
2	Α	No. Many and the most	2		consider to be safe levels.
3	Q	And I know you talked about communicating with	3	0	So he said that the levels were above safe levels
4	`	Mr. Nehlslowe. Do you know Mr. Schmoller at the	4	`	or above just standards in general?
5		DNR? / The large of the configuration of	5 :	: A A	I think he used the term safe, but I can't say
6	A	-Yes. a this are of the work to be shipting.	6		100 percent.
7	Q	And just in general, how many times would you say	7	Q	Sure. And do you know a I think it's
8	are the train	that you talked to him just one-on-one, whether	8	•	Mr. Hausbeck, with the city Department of Health?
9		by telephone or in person?	9	Α	I know who he is.
10	Α	It's not been a lot of times, but I can't give	10	. Q .	Have you ever spoken with him?
11		you an accurate number was a second and a second a second and a second	11	A	I'm not sure. I know he's been at meetings. I'm
12	:- : -•	Sure. Do you remember the substance of the	12	Λ	not sure if he and I ever had a conversation
13	. 4	conversations you've had with him?	13		directly. And the and the vertical and a conversation
14	A		14	Ω	Have you ever spoken with anybody at the city
15		schedules and what results mean.	15		
16	Q	Has he ever told you that your home is unsafe to	16	a zeigtar A	I don't think so, no, besides at meetings.
17	Ų	live in?	17		
18	A	No. The stable defendancy of a stable and the stabl	18	Q	And have you I may have already asked you
19			19		this; I apologize have you had anyone appraise
20	Q	Has he ever told you that it's unsafe to use the	}		your home currently to see what its value is?
1.	A	soil on your property?	20	A	No. 19 1 19 19 19 19 19 19 19 19 19 19 19 1
21	Α	Somebody and I can't recall which person that	21	Q	And have you ever challenged the tax assessed
22		I talked to told me that it would be best if I	22	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	value of your home?
23	D: 0	didn't disturb the soil.	23	A	
24	Q	And it could have been Mr. Schmoller, but you	24		of When? I make any contact that a second of the second of
25		don't recall.	25	A	When I first bought the house, I bought it for

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	Page 39
less than tax assessed value, so I challenged it	1 Acr Uh-huh.
then to get it to what I bought it for.	2 Q Did you do anything else in the kitchen?
3 - A The first time we had testing done, I	3 A We replaced all the cupboards and the appliances
4 challenged it then. And they told me the test	4 and the sink and refinished the floors.
5 results didn't affect the value of my home.	5 Q Did you do any of that work yourself, or did you
6 Q And when was that; do you remember?	6 hire a professional to do it?
7. max A is Probably 2003. Notices and in constant	7 A I did some of it myself.
8 Q And did you what was your response when they	8 Q What parts did you do yourself?
9 see told you that? What we have the second second	9 A I did most of the demolition myself. Well, I
10 A Nothing. I didn't challenge the response.	guess I did all of the demolition myself. And I
11 Q So recently within the last three years you	did I put the drywall up, but I didn't finish
12. segrees haven't challenged it again? see the work for the S.	12 it myself. And I installed the sink.
13 and Arom Huheuh, now meaning indirect provides and in the	13 O Q See Prior to demolishing the drop ceiling, did you
MR. BIANCHI: I don't have any	14 make any effort to determine if there was any
further questions, but some of the other	asbestos contained in the ceiling?
16 fillsaft a attorneys may, come on the language of the	16 A The drop ceiling was drywall, so it was so it
17-a potezionen ara examinațion a biano de 2	17 a gas forwasn't panels like you think of, of a drop
18 man BY MR. WHITE: and a superior to any gradient	18 say a ceiling. So, no, I did not test it. Addis a
19 Q My name is Chris White. I represent Continental	19 Q Did you cut the hole for the pass-through?
Casualty Company and Columbia Casualty Company,	20 mg m. A. m. Yes. man men mili any historia a leke
which are some of Madison-Kipp's insurance	21 Q Before you did that, did you make any effort to
companies. I have a couple additional questions.	determine if the wall material had any asbestos
23 years First, to change gears for a moment.	23 in it? Panisargia (s.
24 A Okay. Such add bits gentler district to a	24 A The wall material was lath and plaster, and I
25 Q Where were you living on January 1, 1980?	25 sage didn't test it. sev Berne feel arry () in the
Page 38	Page 40
	1 Q Did you wear any respiratory protection while you
1 A Elk Mound, Wisconsin and remaine	1 Q Did you wear any respiratory protection with e you
1 A Elk Mound, Wisconsin. and we add to be a like of the continue to live in Oak Mound,	2 were doing this work?
2 Q How long did you continue to live in Oak Mound,	2 were doing this work?
2 Q How long did you continue to live in Oak Mound, 3 stay and Wisconsin? 4 A Elk, E-L-K. 5 Q How long did you continue to live in Elk Mound,	2 were doing this work?
2 Q How long did you continue to live in Oak Mound, 3 down to Wisconsin? 4 A Elk, E-L-K. 5 Q How long did you continue to live in Elk Mound, 6 Wisconsin?	2 were doing this work? 3 A A Yes, I did. A
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1		Page 41	***************************************	Page 43
1	A	We would sometimes eat dinner out there in the	1	
1	Α		1	the home?
2	0	summer and sit out there.	2	A Right.
3	Q	What is the approximate distance from the end of	3	MR. BIANCHI: Okay.
4		your back deck to Madison-Kipp?	4	EXAMINATION
5	Α	Guessing, 30 feet. I don't know.	5	BY MR. WHITE:
6	Q	And at that time you purchased the house, the	6	Q Can I just ask one follow-up question. What year
7		Madison-Kipp facility was in the same place	7	was the oldest of the foster children born in?
8		that's it in today, right?	8	A The last one was four years old when he left. So
9	Α	Yes.	9	he would have been the oldest of the ones that we
10		MR. WHITE: That's all I have.	10	had. So he left in 2009, so that would be born
11		THE WITNESS: All right.	11	in 2005.
12		EXAMINATION	12	Q So none of these children were alive in 1987.
13	BY	MS. KREIL:	13	A No. in the service of the service
14	Q	I have just a couple questions. Do you have a	14	MR. WHITE: That's all I have.
15	`	twitter account?	15	MR. MANZKE: Okay. We'll reserve.
16	Α	I do.	16	You're done.
17	Q	Do you ever tweet about Madison-Kipp?	17	(The proceeding concluded at
18	A	My twitter account is mostly for work, so I don't	18	11:57 a.m.)
19	А	think so.	19	11.57 d.III.)
20	0		20	94.4 - 1954 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 1964 - 196
1	Q	Okay. In looking at Exhibit 7, Page 2, it looks	21	process of participation and the participati
21		like you have some links to a couple of articles	ł.	
22		that we've already discussed. Do you recall	22	THAT I WE HOUTER AND A SECTION IS NOT A SECTION OF
23		where you got this information?	23	parkties in such a character of the contraction of
24	Α	I probably just searched for it.	24	THE WARTER SET OF THE SERVICES
25	Q	Do you maintain a file or any type of electronic	25	
		Page 42		Page 44
		1490 12	1	Lage II
1			1 1	STATE OF WISCONSIN)
1		resource where you put all the materials that you	1 2	STATE OF WISCONSIN)
2		found?	2) SS:
2 3	A	found? No.		,
2 3 4	A Q	found? No. Okay.	2 3) SS:
2 3 4 5		found? No. Okay. MS. KREIL: That's all I have.	2 3 4 5 6) SS: COUNTY OF MILWAUKEE) I, PHYLLIS KAPARIS, Court Reporter and Notary Public in and for the State of Wisconsin, do
2 3 4 5 6		found? No. Okay. MS. KREIL: That's all I have. MR. BIANCHI: Charles?	2 3 4 5 6 7) SS: COUNTY OF MILWAUKEE) I, PHYLLIS KAPARIS, Court Reporter and Notary Public in and for the State of Wisconsin, do hereby certify that the above deposition of DEANNA
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