

MR. ROGERS, EXAM. BY MR. MERRICK

1 Q. And so was that a factor in your mind at the time --

2 A. No.

3 Q. -- the need to protect DEVCO?

4 A. Not --

5 Q. That, in fact, you --

6 A. Not --

7 Q. -- might be --

8 A. No, no, not -- not beyond the various things I've
9 narrated in the testimony. I mean, I -- no, I don't
10 think this was ever raised as an issue between us or, as
11 you might describe it, as a threat. It wasn't --

12 Q. All right. In any event, we know that very shortly
13 after that there is a final agreement, I guess,
14 negotiated. Can you turn to Exhibit 62, which should be
15 a small bundle of documents that we're probably going to
16 get for you.

17 A. Okay.

18 Q. Yes, it's on the way. [Clerk provides exhibit].
19 That's a letter to Curragh from your Department?

20 A. Yeah.

21 Q. Can you tell me what that is?

22 A. This is -- there are, in fact, two letters here, or
23 should be two letters if --

24 Q. Yes.

25 A. The one is an offer, a formal contractual offer, to