

# **EXHIBIT G**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x

In Re: Quigley Company, Inc.,  
Debtor,

-----x

DEPOSITION OF CHARLES FERGUSON

New York, New York

June 26, 2007

Reported by:

MARY F. BOWMAN, RPR, CRR

JOB NO. 12179

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

June 26, 2007

9:51 a.m.

Deposition of CHARLES FERGUSON, held  
at the offices of Cadwalader Wickersham &  
Taft, LLP, One World Financial Center, New  
York, New York, before Mary F. Bowman, a  
Registered Professional Reporter, Certified  
Realtime Reporter, and Notary Public of the  
State of New York.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

A P P E A R A N C E S :

BROWN RUDNICK BERLACK & ISRAELS, LLP

Attorneys for Plaintiff

One Financial Center

Boston, Massachusetts 02111

BY: GREGORY T. ARNOLD, ESQ.

CADWALADER, WICKERSHAM & TAFT, LLP

Attorneys for Defendant

One World Financial Center

New York, New York 10281

BY: J. DAVID LEAMON, ESQ.

SCHULTE, ROTH & ZABEL, LLP

Attorneys for Quigley Company, Inc.

919 Third Avenue

New York, New York 10022

BY: BRYAN J. LEVINE, ESQ.

1

2

A P P E A R A N C E S:

3

TOGUT, SEGAL & SEGAL LLP

4

Attorneys for Al Togut as Futures Claims

5

Representative

6

One Penn Plaza

7

New York, New York 10019

8

BY: RICHARD K. MILIN, ESQ. (by telephone)

9

10

POWERS & FROST, LLP

11

Attorneys for Pfizer

12

One Houston Center

13

Houston, Texas 77010-2007

14

BY: SHARLA J. FROST, ESQ.

15

-and-

16

Nottingham Center

17

502 Washington Avenue, Suite 200

18

Towson, MD 21204

19

BY: PATRICK C. SMITH, ESQ.

20

21

ALSO PRESENT:

22

Kyu Paek, Summer Associate,

23

Schulte Roth & Zabel

24

25

Carlos Lopez, Videographer, TSG Reporting

1 FERGUSON

2 recreate that occupational history going back  
3 30, 40, 50 years sometimes and then trying to  
4 identify the job sites that they had worked at  
5 and then there is an enormous amount of work  
6 that just continues to go through, that we go  
7 through in terms of then developing that case.

8 So it is not a particular product per  
9 se that we are focused on, but trying to  
10 recreate that work history.

11 Q. What is your understanding of the  
12 Pfizer products, the products manufactured, sold  
13 or distributed by Pfizer that are at issue in  
14 connection with whether your claimants have a  
15 Pfizer-related claim in connection with the  
16 Quigley bankruptcy?

17 A. Certainly KilNoise and then as well as  
18 I believe some of the Quigley products as well  
19 as a distributor certainly. There very well may  
20 be others, I don't know.

21 MR. MILIN: I am sorry to interrupt  
22 but I really cannot hear very well. Can we  
23 move --

24 MR. SMITH: Let me move the phone.

25 Q. Mr. Ferguson, for the products

1 FERGUSON

2 manufactured, sold or distributed by Pfizer, why  
3 is it that you are not able or your firm is not  
4 able to provide us in connection with this  
5 deposition today a listing of claimants who have  
6 allegations of exposure to those Pfizer-related  
7 products?

8 A. I believe there is a reasonable basis  
9 to suggest that each of our claimants has an  
10 allegation of exposure to a Pfizer product.

11 Q. All right. So as you sit here today,  
12 it is your firm's position that each and every  
13 client who has an asbestos exposure that relates  
14 to Quigley also has a similar identical claim as  
15 it relates to Pfizer products?

16 MR. ARNOLD: Object to the form.

17 A. I believe that there is. It may very  
18 well be that with further discovery that we  
19 could fine-tune it somewhat, but yes.

20 Q. In order to determine if one of your  
21 claimants has an exposure solely to a  
22 Quigley-manufactured product or to a Pfizer  
23 manufactured product, it would require  
24 additional discovery? It is not something that  
25 you can tell at the front end of the case?