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there, why not? But they just, they wanna be sure it's a real opportunity as opposed to just some, like, (UI) Ohio thing and ERIC KENNEDY is not doing anything. He's not going to.

BALDUCCI:

Right.

BACKSTROM:

Uh...

BALDUCCI:

Is that just because he can't get it done or 'cause he doesn't think it's a real deal?

BACKSTROM:

Um...

BALDUCCI:

Yeah.

BACKSTROM:

...That, I mean, at first it was oh, we got get in there and get hired as soon as possible. Eh. And uh, and just had, you know, we been pushin' 'em all (UI)

BALDUCCI:

Well, I got some people in my office doing some research on the funds in Pennsylvania and Ohio and what the exposure is and what the numbers may be...

BACKSTROM:

Mm-hmm.

BALDUCCI:

...and I think we have an opportunity to, to get in at least to Pennsylvania pretty straight.

BACKSTROM:

Mmm.

BALDUCCI:

And make a pitch to get hired, but you know I don't wanna do it and I'm not gonna do it unless you guys think it's

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something you wanna do, you know. But we'll just cross that bridge I guess when we get there and...

BACKSTROM: Yeah.

BALDUCCI: ...We'll kinda vette that research and see...

BACKSTROM: Yeah.

BALDUCCI: ...if it's got the same, you know, cache that Kentucky had...

BACKSTROM: Yeah. Nah, it's, it's, if there's a real chance to get in (UI) of the same view, You know we knew it, we know what we're getting ourselves into so let's just do it.

BALDUCCI: And like I said before, hell, we're in a better position now than we were back then to take a more active role and commit people and resources to it than we were...

BACKSTROM: Mm-hmm.

BALDUCCI: ...back before when I was the only damn lawyer in the firm, you know? We got folks now we can put on doin' some of that grunt work.

BACKSTROM: Mm-hmm.

BALDUCCI: But uh...

BACKSTROM: The BALDUCCI super firm over there....

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BALDUCCI: That's it. That's it, baby. Rockin' and rollin'. Um, alright, I gotta ask you, I, I need to ask you about somethin' else now that I've kinda stumbled in because of my status as a mega firm.

BACKSTROM: Yeah.

BALDUCCI: Um, alright, um, RICHARD IUBE (phonetic), who I think you probably know, former Attorney General in Louisiana, buddy of SCRUGGS...

BACKSTROM: Mm-hmm.

BALDUCCI: ...uh, back from tobacco days and all, he's joined us of counsel now...

BACKSTROM: Mm-hmm.

BALDUCCI: ...and STEVE and he go back a long way too...

BACKSTROM: Mm-hmm.

BALDUCCI: ...but anyway, we're talking with him the other day about maritime, JONES ACT stuff, uh...

BACKSTROM: Who's he workin' for now? Not...

BALDUCCI: He's...

BACKSTROM: ...not anybody?

BALDUCCI: ...not anybody. He's kind of, he, he's lone wolfin' it right now.

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BACKSTROM: So it's like RICHARD IUBE,  
Attorney at Law?

BALDUCCI: He's, he's been connected in an  
of counsel role with some firm  
in Lake Charles, I think...

BACKSTROM: Mm-hmm.

BALDUCCI: ...but he's dropping that and  
becoming of counsel to us and  
just gonna do a deal with us.

BACKSTROM: Mm-hmm.

BALDUCCI: So um, but he's got a awful lot  
of connections down there, you  
know, in Louisiana on all these  
types of things. One thing we,  
that just kinda we were  
stumbled into, I went to New  
Orleans this week and um, I was  
down there and we had lunch and  
talked about just a bunch of  
business opportunity stuff, but  
one of the things we kinda  
stumbled into was he has worked  
previously with his nephew on  
actually seizing oil tankers  
that have come into the port of  
New Orleans and port of Lake  
Charles..

BACKSTROM: Mm-hmm.

BALDUCCI: ...from foreign nations.

BACKSTROM: Right.

BALDUCCI: And I thought about, during  
that time, I thought about  
ya'll's judgement against  
Venezuela...

BACKSTROM: Mm-hmm.

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BALDUCCI: ...That I don't really know much about other than I think you've got a judgement and you need to collect for a whole bunch of money and you need to collect it. And there is in Lake Charles, there is the largest CITGO refinery in the world...is in Lake Charles.

BACKSTROM: Mm-hmm. Mm-hmm.

BALDUCCI: And there is, you probably know this, CALSASHUE (phonetic) or CALSACUE (phonetic), uh...

BACKSTROM: CAL, CALCASHUE (phonetic).

BALDUCCI: CALCASHUE uh, LANE or whatever? That goes to it from the port and he says that you know, the government of Venezuela is runnin' vessels up and down that thing all the time...

BACKSTROM: Mm-hmm.

BALDUCCI: ...going to that refinery.

BACKSTROM: Mm-hmm.

BALDUCCI: And he says that he thinks that we can seize one of those vessels...

BACKSTROM: Mm-hmm.

BALDUCCI: ...or, or more I don't know how much an oil rig is worth, but you know, assuming, I mean, we could sue, seize five or six of 'em to satisfy the judgement if we had to I think, but that's somethin' That I wanted to ask you about and see if that, is

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That somethin' you think that has any legs to it?

BACKSTROM: Mm-hmm.

BALDUCCI: Um, to try to...

BACKSTROM: Yeah, I mean we need to, we need to get our judgement in a collectable posture. Um...

BALDUCCI: Oh, is it not?

BACKSTROM: ...it's not yet. Uh, you know, he's entered that judgement in our favor, but, but not for a liquidated amount yet. And so...

BALDUCCI: Oh, well somewhere in my mind I thought it was like forty million dollars. Where...

BACKSTROM: No.

BALDUCCI: ...I got that from some impression I had somewhere.

BACKSTROM: Yeah. Um, no he's just found that we're entitled to fees, but he hadn't determined the amount. I mean the, if he follows our form, our formula, yeah, it'll be, forget what the number is, but I think it's forty.

BALDUCCI: Ok, well I, I knew I...

BACKSTROM: (UI) (talking simultaneously)

BALDUCCI: ...thought I had pulled that out of somewhere...

BACKSTROM: Mm-hmm.

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BALDUCCI: ...from some conversation.

BACKSTROM: Yeah.

BALDUCCI: Well, anyway...

BACKSTROM: But yeah, no, that would be fine.

BALDUCCI: ...where, where is that judgement? Is it Louisiana or Mississippi?

BACKSTROM: Um, Mississippi, but we would enroll that judgement in...

BALDUCCI: (UI) federal court...

BACKSTROM: ...New Orleans or wherever else and...

BALDUCCI: ...yeah.

BACKSTROM: ...you know, go after some shit There's a guy that I used to work with in New Orleans. That's pretty much all he does. Does it by the hour. Um, and...

BALDUCCI: Oh, ok. I didn't know that.

BACKSTROM: ...so it's, it's easy stuff. I mean I used to, when I was a first year associate, I would get to go do some of that stuff and get down there and seize it and the Marshalls loved it because it's the only time they really get to ever do anything (UI)

BALDUCCI: (laughs)

BACKSTROM: (UI) New Orleans (UI) So, go down there with a ship seizure

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and they'd be like, woo hoo, you know? They get to run some friggin' Mexicans off a boat.

BALDUCCI: (laughs)

BACKSTROM: Um, and it's, it's hell for 'em because the crew's gotta stay there and the crew can't do anything. The crew doesn't get paid unless their under way and...

BALDUCCI: I see. Well, you may not need our help on that, then. That was just somethin' I didn't, I didn't know. I thought I'd mention it to ya.

BACKSTROM: Yeah, well if he could...

BALDUCCI: And see.

BACKSTROM: ...That guy over in Lake Charles that does that kind of stuff, we'd hire him to do it, but it wouldn't be, it's no great shakes. I mean it's like doin' it...

BALDUCCI: I got you.

BACKSTROM: ...it's like doing real estate closing work.

BALDUCCI: Really? Ok.

BACKSTROM: Yeah.

BALDUCCI: See, I thought it was a big deal.

BACKSTROM: Yeah.

BALDUCCI: No, that's fine then.

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BACKSTROM: No, it's easy.

BALDUCCI: No, I don't think that's the kind of the opportunity that, that they would be, I mean they might, but I mean that's not what I thought. I thought it was a big deal, but it's...

BACKSTROM: Yeah.

BALDUCCI: ...'cause I just don't no.

BACKSTROM: Yeah.

BALDUCCI: Ok, then.

BACKSTROM: Yeah.

BALDUCCI: What else you got, man?

BACKSTROM: Tryin' to get through discoverin' this McINTOSH case. Try to keep my sanity. It's like I, I, you know. I hang around DICK and ZACH all the damn time and it's all we talk about and I'm just like, it's bad enough to have to deal with it...

BALDUCCI: Yeah.

BACKSTROM: ...to have to relive it with these fuckers everyday. And they just talked about that fucking HOOD thing going on today, you know, for at least two hours today about you know, I'm just like guys can't do anything about that.

BALDUCCI: Just wears you down, doesn't it?

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BACKSTROM: Yeah. I, I got some other shit I need to be doing, so. Uh, do you know who's leading the effort for him in that case?

BALDUCCI: No. Mm-mmm.

BACKSTROM: Yeah. But if he had somebody that knew what the hell they were doing, they would have called us as witnesses to say here's what JIM bargained for and he didn't get it.

BALDUCCI: Mm-hmm.

BACKSTROM: Somebody other than JIM...

BALDUCCI: Yeah.

BACKSTROM: ...could say that and give it some credibility. Uh, but those fucking jack-offs, man. PITTMAN and CUPIT (phonetic) and all. They know, they don't know, all they know...

BALDUCCI: Mm-hmm.

BACKSTROM: ...is they were trying to gum up the deal so they could get paid.

BALDUCCI: (laughs) Yeah. That's right.

BACKSTROM: And uh, now they punched the tar baby and they're representing the AG. You know, I don't know, they don't know what the hell to do.

BALDUCCI: Yeah. No, I don't know. I've been completely out of the loop on all that.

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BACKSTROM: Mm-hmm.

BALDUCCI: I haven't seen or talked to HOOD in months.

BACKSTROM: Mm-hmm.

BALDUCCI: Months. You know, I think he's for, you know, firmly attached at JOEY's hip and, you know I think when the, when everything broke up, you know, he stuck his flag over in JOEY's corner and, I mean, I haven't heard from him.

BACKSTROM: Mm-hmm.

BALDUCCI: 'Course I hadn't reached out to him either, but I mean it's...

BACKSTROM: Mm-hmm.

BALDUCCI: He ain't gonna dance with the one who brought him to, to the dance.

BACKSTROM: Mm-hmm. Uh, well, I mean, hell he was (UI) too. He was, subpoenaed himself. Friggin' wife was subpoenaed. And um...

BALDUCCI: Whose?

BACKSTROM: HOOD's.

BALDUCCI: What the hell was his wife subpoenaed for?

BACKSTROM: Fucking STATE FARM. Being STATE FARM.

BALDUCCI: JESUS.

BACKSTROM: So. It's a friggin' billing

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fiasco over (UI).

BALDUCCI:

Yeah, I'm sure.

BACKSTROM:

So. THAT's really it, man. Just workin' on that and um, you know, even, even the judge is gonna get (UI) GOD damn. What do we have to do to get rid of this case? (laughs)

BALDUCCI:

I bet. Mmm.

BACKSTROM:

So.

BALDUCCI:

You said the other day, when you, when I talked to you last night, you said DICK was walkin' the floor or somethin' over this LACKEY deal. Is he, is he ok? Or is he, is he pissed at me over this? Or what's his trouble about 'bout all this?

BACKSTROM:

You know, I told him, guys, I said, part of the reason why it hadn't been on the front burner is because we told him it didn't have to be. And I oversold that a little bit. I said shit, we're defendants. We, we can wait out, we can wait till the cows come home. You know and uh, and they bought that for a little while. They were good with that for a little while, but then um, it just, you know, when you gonna get that order? We need that order? Well, we really don't. Our lawyers aren't billing us anything, 'cause they ain't doing anything.

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BALDUCCI: Mm-hmm.

BACKSTROM: It just...anyway but you know, they just got it in their heads that they wanted it, you know?

BALDUCCI: Right.

BACKSTROM: And uh, so they were like, can you call TIM and I was like. Yeah, I can call TIM. No problem. You know, and then later that day, DICK was like, no we can go about this another way. Don't call TIM. I'll, I'll go about it another way... a more indirect way. And I was like well what are you plannin' on doin'? And he was like, I'm, I'ma handle it. I'ma handle it. And, kinda givin' me the you don't wanna know kinda thing. And I was just like...so I don't know what he did. You know?

BALDUCCI: (laughs) No tellin'.

BACKSTROM: He probably called dumb ass JACK DUNBAR and said you know, will you handle this for me or somethin' like that. 'Cause he had just talked to JACK the day before.

BALDUCCI: Mm-hmm.

BACKSTROM: So, I had a feeling yeah, whenever DICK talks to somebody, he automatically thinks of something that they could do on something else and...

BALDUCCI: Yeah.

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BACKSTROM: ...so I have a feeling it was that, but um...

BALDUCCI: Well.

BACKSTROM: ...speculation.

BALDUCCI: I can put his concerns to rest that it's, it's all done. And too, he had paid the money too and he was probably upset, you know, or concerned that you know, it wasn't gettin' delivered either.

BACKSTROM: Mm-hmm.

BALDUCCI: Like it was supposed to. You know, that may have been part of the problem.

BACKSTROM: Mmm. Um, well...

BALDUCCI: Well.

BACKSTROM: ...but anyways (UI) it was a (UI) thought.

BALDUCCI: Yeah. Yeah. I wouldn't give, give it much concern.

BACKSTROM: So.

BALDUCCI: How's your fam? Everybody good?

BACKSTROM: Good, man. Big time trick or treating. That kind of thing.

BALDUCCI: Woo woo.

BACKSTROM: What about yours? Yours get too old to do that?

BALDUCCI: Yeah, you know, they think that's, they're too cool for

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that, but they still wanna be around it because like last night, they sat out on the porch and handed out candy.

BACKSTROM:

Yeah.

BALDUCCI:

So they wanted to see all the kids as they were comin' up and uh, be a part of it, but they didn't, they were way too cool to actually go trick or treating.

BACKSTROM:

(laughs)

BALDUCCI:

And they went to, you know, the little fall festival or whatever at the church and...

BACKSTROM:

Mm-hmm.

BALDUCCI:

...so, it's still a, still an event, but not...

BACKSTROM:

Mm-hmm.

BALDUCCI:

...trick or treating.

BACKSTROM:

Mm-hmm.

BALDUCCI:

Did your little ones go trick or treating?

BACKSTROM:

Oh yeah, man. SETH loved it. He was BUZZ LIGHTYEAR (UI).

BALDUCCI:

Oh yeah.

BACKSTROM:

He loved it. Great time. I mean he just, you know, JANE and DREW they get candy, they expect that. They're happy with it at a certain level and they doing it but I mean, when you

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get a two year old something...

BALDUCCI: (laughs)

BACKSTROM: ...That is of value to the two year old...

BALDUCCI: (laughs)

BACKSTROM: ...That is...oh my God...

BALDUCCI: (laughs)

BACKSTROM: ...I got M&Ms. You know?

BALDUCCI: (laughs)

BACKSTROM: (UI) it's awesome.

BALDUCCI: Just the greatest thing in the world.

BACKSTROM: Oh yeah. Yeah. Big time. Yeah, they had a little neighborhood party before (UI) and ran around like little Indians, had a good time. So, everybody's good.

BALDUCCI: Good.

BACKSTROM: Trying to get the wife to plan this party, you know.

BALDUCCI: Kickin' back.

BACKSTROM: Mm-hmm.

BALDUCCI: (sighs)

BACKSTROM: I gotta take you out to my new house as soon as it kinda gets in (UI)

BALDUCCI: Yeah, I wanna see it.

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BACKSTROM: As soon as, (UI) 'cause it, as soon as it, they're working on the framing of the upstairs right now and as soon as we get a roof on they're gonna put some stairs up there and at that point, I can start takin' people out there and showin' 'em, but right now, it's hard to really tell...

BALDUCCI: Mm-hmm.

BACKSTROM: ...what's gonna be what.

BALDUCCI: Yeah.

BACKSTROM: You know? You can't really walk through it 'cause they've got...

BALDUCCI: Well once they get it blacked in, you can tell a lot about it.

BACKSTROM: Yeah. Well I mean, right, like I can tell right now what it's gonna, what the ground floor is gonna look like, but there's so much bracing across the rooms and stuff...

BALDUCCI: Mm-hmm.

BACKSTROM: ...(UI) because they are getting ready to do the framing upstairs that it's hard to walk through there.

BALDUCCI: Right.

BACKSTROM: (UI)

BALDUCCI: I know what you mean.

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BACKSTROM: Doesn't make any sense to go out there.

BALDUCCI: Well, that's exciting though, to be...

BACKSTROM: Mm-hmm.

BALDUCCI: ...to be doing all of that.

BACKSTROM: Yep. Yep, yep, yep, yep.

BALDUCCI: Well man I'll let you go. I know you got stuff to do. (UI)

BACKSTROM: What else you got going on today?

BALDUCCI: 'Bout it.

BACKSTROM: Mm-hmm.

BALDUCCI: About it. Just, you know...

BACKSTROM: Did you ever get set up to where you could do your real estate closing stuff or are you (UI)

BALDUCCI: Uh, yeah, we, we're (sighs), God, it's been such a nightmare, uh, gettin' insurance, but...

BACKSTROM: Well how'd you end up doing it? (UI)

BALDUCCI: We wound up gettin' a quote that actually, SID's not that bad, for about I think seven, six or seven lawyers um, for malpractice coverage it was like thirty thousand dollars for a million, you know, a million dollars.

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BACKSTROM: Mm-hmm.

BALDUCCI: Million dollars.

BACKSTROM: Mm-hmm.

BALDUCCI: (sighs) Now, 'course it's terrible coverage. You know, it's a...

BACKSTROM: But you just had to have it though.

BALDUCCI: ...you just gotta have it to demonstrate you have it so you can sell title insurance and the banks, you know, will let you do their work. So, we gotta I, in fact, I think we're gonna get a binder today on it. So once we get all our ducks in a row, you know, we'll start go, we're about a month behind to where I thought we were gonna be when we started puttin' all that together.

BACKSTROM: Mm-hmm. Well, that's cool. That'll be a little (UI)

BALDUCCI: Yeah, I hope it'll just generate a little cash to help, you know, pay the bills and have a little grocery money, you know?

BACKSTROM: Mm-hmm. Exactly uh, so, where where are your new lawyers? Are they in New Albany office?

BALDUCCI: Yeah.

BACKSTROM: Except SARAH BIDEN?

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BALDUCCI: Um, SARAH's of course in Washington. Um, SHANNON CONE, she's um, on maternity. She's, she was havin' a baby and she's already on maternity. She kinda started on maternity.

BACKSTROM: Mm-hmm.

BALDUCCI: And uh, she lives in Ripley. And uh, so she's not really in right now, but I mean, you know we have those, we have two offices right now.

BACKSTROM: Mm-hmm.

BALDUCCI: You know we got a war room in New Albany that half of us are in and then we gotta, the SHANDS (phonetic) downtown that a few of us are in and that's, that's our, you know, facially our office, but...

BACKSTROM: Mm-hmm.

BALDUCCI: ...over half of us are just in a old building downtown that we rented, just, you know, got tables and chairs sittin' out there workin' off of for the time bein'.

BACKSTROM: Mm-hmm.

BALDUCCI: 'Till we can get our new building going.

BACKSTROM: Mm-hmm. Got BUSE over there...

BALDUCCI: Yeah.

BACKSTROM: ...crackin' heads.

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BALDUCCI: That's it.

BACKSTROM: Yeah.

BALDUCCI: Movin' and shakin'.

BACKSTROM: (laughs)

BALDUCCI: Alright, brother. I appreciate you.

BACKSTROM: Alright, man.

BALDUCCI: And I'll uh, I'ma see, I'ma yell at SCRUGGS before I leave if he's here.

BACKSTROM: Mm-hmm. I think he is.

BALDUCCI: (UI)

BACKSTROM: Came in about, you know, eleven (UI)

BALDUCCI: God, don't you hate that? You know, JOEY used to be the world's worst at that. JOEY would, you know, be at home...STEVE's pretty bad about it. You know, JOEY would call from his house, you know at 10:30 and say I'ma be there in a minute, but...

BACKSTROM: Mm-hmm. Yeah.

BALDUCCI: Good stuff.

BACKSTROM: Yeah.

BALDUCCI: Good stuff. Good stuff. VICKI, keep him straight.

EVANS: Who SID, SID's always straight.

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BACKSTROM: Mm-hmm.

VICKI (LNU): That's not who I have to worry about.

BALDUCCI: Do your thing.

VICKI (LNU): (UI) (laughs)

BACKSTROM: (UI)

VICKI (LNU): (UI)

BALDUCCI: Hey.

UF5: Hey.

BALDUCCI: Does he have a minute? Is he on...the phone?

UF5: He's on the phone, but I think he has a minute.

BALDUCCI: Ok. Um, will you let him know when he gets off that I need to just, need just to spend a quick second with him?

UF5: I'll do it.

BALDUCCI: Thank you.

UF5: Mm-hmm.

BALDUCCI: How is everything?

EVANS: Mmm. 'Bout the same.

BALDUCCI: Well, what about uh, what about LSU?

VICKI (LNU): Oh, shit.

BALDUCCI: (laughs)

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VICKI (LNU): (laughs) (UI) can't talk about that one.

BALDUCCI: Mmm. Can't talk about that, huh? They SABAN, you think SABAN gonna be ready?

VICKI (LNU): (UI) Hell no.

BALDUCCI: What's your boy say?

VICKI (LNU): I don't, I ain't even ask. Cause he's like, you know.

BALDUCCI: Yeah.

VICKI (LNU): Mm-mmm. (UI) I'm going to the game, though.

BALDUCCI: Mmm.

VICKI (LNU): We're gonna see what happen.

BALDUCCI: Well that's gonna be a big 'ol deal, isn't it?

VICKI (LNU): (UI) Uh huh, gonna be a game. And a good game, I hope.

BALDUCCI: (UI) write this down, this auction company. Hand, hand me a sticky if you don't mind. I need to...thank you.

VICKI (LNU): Yep. the next few games for ALABAMA should be a good game (UI) MISSISSIPPI STATE, LSU and... that's all they have left. LSU and MISSISSIPPI STATE.

BALDUCCI: Yeah, just kinda windin' down, isn't it?

VICKI (LNU): Oh, thank God. I'm so...

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BALDUCCI: Finally.

VICKI (LNU): ...(UI) I won't be able to go to all, of JUSTIN's the baseball games but I'ma go to some of 'em. Got to.

BALDUCCI: Oh, is he gonna play baseball too?

VICKI (LNU): Mm-hmm.

BALDUCCI: Golly. That boy is a machine, VICKI.

VICKI (LNU): Good afternoon, SCRUGGS LAW FIRM. Hey, RHEA, what's up? Doing good. He is. Hold on for a second. (pause) Hey, it's RHEA TANNEHILL.

BALDUCCI: Ya'll got a busted tile here.

VICKI (LNU): All, I mean, all the time. I mean we've repaired that so many times.

BALDUCCI: The same one or...? Really?

VICKI (LNU): Mm-hmm. Right there and right here at the very end (UI) I don't know what's going on, but.

BALDUCCI: I bet the floor's uneven right there. Probably has a buck in it. When you step on it...

VICKI (LNU): Uh-huh.

BALDUCCI: ...it cracks it.

VICKI (LNU): (UI) I know its been repaired three times already.

BACKSTROM: Hey, you don't (UI)

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VICKI (LNU) : What? (UI)

BACKSTROM: (UI)

VICKI (LNU) : (UI)

BACKSTROM: Right.

VICKI (LNU) : (UI) How much is that? Oh, (UI) selections. Oh, ok. (UI) you shoulda got my (UI) Yeah. With no mayo. Mm-hmm. (UI) Yeah. (UI) Probably. Yeah. I don't, I don't think so, but they, That's, nah, 'cause I can get that wacky thing or whatever that is. What's, what's that... a little, a little (UI)? Yeah, what's that? That comes on a... nah, you know what? I'm not gettin' That. I don't want anything. Uh-uh. Help yourself. Knock yourself out. 'Cause I gotta exercise Monday (UI) on a full stomach. I can't...yeah. I'm positive. Bye. (hangs up) (UI)

BACKSTROM: (UI)

VICKI (LNU) : She moving cars.

UF6: Oh, ok. (UI) a copy of (UI)

VICKI (LNU) : Mm-hmm.

UF6: Thank you.

(talking in background; non-pertinent conversation)  
(RICHARD SCRUGGS talking in background; UI)

BACKSTROM: (talking in background) (UI)  
Right. Right. (laughs) I have a (UI) uh, (UI) (laughs)

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BALDUCCI: (whispering to himself) (UI)

BACKSTROM: (UI) very (UI) uh (UI) (laughs)

(telephone ringing in background)

VICKI (LNU): Good afternoon. SCRUGGS LAW FIRM. Yeah. (UI) Oh, I'm sorry, ma'am. He is on the phone right now. He's on a conference call. I have no idea, ma'am. I'm sorry. I really (UI). Ok. Alright. Bye bye. (hangs up)

(talking in background) All I have to do is (UI) (laughs)

(pause; BALDUCCI waiting)

(talking in background) Alright man. I'll let you go (UI).

(cellular telephone ringing in background)

VICKI (LNU): Hello? Hey. Nothin' much. What's up (UI). Nuh-uh. Yeah, I'm going today. Yeah. (UI) I can get...what you got...for who? What you talking about (UI)? (UI) What you talking about? No, it's not for an extra ticket. It's like he has to get tickets (UI). (UI) they, they're, they're gonna travel to Alabama? Who? Well, in order to get a ticket, I have to know your friend name, 'cause that's the only way they can get in there. (UI) Oh. (UI) Oh, oh. I have to ask (UI). I have to ask (UI) about this. How many tickets?

(telephone ringing in background)

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VICKI (LNU): Hold on for a sec. Hold on.  
Hold...how many tickets?

UF7: Good afternoon, SCRUGGS LAW  
FIRM.

VICKI (LNU): Shoot. They gonna cost a good  
forty, forty-five.

UF7: He is, Mr. (UI). I'm sorry.  
(laughs)

VICKI (LNU): I don't know. It depends on  
what...

UF7: Ok, well...

VICKI (LNU): ...what's left. I mean, I have  
to call (UI) and ask him.

UF7: ...alright. Bye. (hangs up)

VICKI (LNU): Well how many tickets are  
there? How many tickets? Two  
tickets? Alright. Ok. Alright,  
(UI). Shoot (UI). (UI) and get  
no damn tickets...LSU and  
ALABAMA? You crazy. Probably  
sold out. I know they sold out  
ALABAMA (UI). No tickets left.

UF8: I mean they, you can get (UI)  
tickets. It just depends on how  
much you willin' to pay for  
that ticket.

VICKI (LNU): (talking simultaneously) Pay  
for it. (laughs) And that's the  
truth.

UF8: You better come on.

VICKI (LNU): (laughs)

UF8: (UI)

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VICKI (LNU) : I don't know why. (UI) around there. (UI) last minute (UI) ticket.

UF8 : Who?

VICKI (LNU) : My brother. (UI)

UF8 : And then get two tickets, too.

VICKI (LNU) : And then want two...

UF8 : (UI) and stuff. Mm-mmm.

VICKI (LNU) : Mm-hmm. Uh, (UI) right here. (UI) I know you (UI) You just a (UI)

UF8 : They don't get but like two, four people, don't it? Maybe two?

VICKI (LNU) : Yeah, because he's having to ask other people to give (UI)

UF8 : Mm-hmm. To put it on their names...

VICKI (LNU) : Yeah. Mm-hmm.

UF8 : 'Cause that's what um, somebody did for a basketball game here. He had his friend put me on his list. I'm like (UI) boy. I'm (UI)

VICKI (LNU) : Mm-hmm. (UI)

UF8 : But I love that too. (laughs) Actually um, thank you. I should be on the list. (laughs)

VICKI (LNU) : (laughs)

UF8 : Too bad he was ugly. Sorry.

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VICKI (LNU): (laughs) You crazy.

UF8: I'm sorry that you're ugly, but not my fault.

VICKI (LNU): Oh my God. Did you finally find ZACH a, a parking (UI).

UF8: It wasn't no problem. There's so many parking out there. (UI)

VICKI (LNU): Really? Did you go (UI)

UF8: I ain't even see his car, let alone (UI)

VICKI (LNU): But, but did she mark?

UF8: Mm-hmm. Now DICK's car wasn't marked. I don't even know what DICK's car look like.

VICKI (LNU): I don't know.

UF8: I don't know where it is.

VICKI (LNU): I have no idea either. I ain't (UI) Sorry. (UI)

UF8: It wasn't marked when I left (UI).

VICKI (LNU): (UI) They got a lot of (UI) right there.

---

RICHARD SCRUGGS: Hey, man.

UF8: (laughs)

VICKI (LNU): (laughs)

BALDUCCI: Hey, sorry to...

SCRUGGS: I don't practice law. I talk on the phone.

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BALDUCCI: I know. I know. That's alright. You got just a minute for me?

SCRUGGS: Sure do. I'm sorry to keep you waiting. (UI)

BALDUCCI: No, that's fine. Listen, it's no, no problem. I know you got, you got a lot going on here.

SCRUGGS: Well (sighs), come in.

BALDUCCI: Thank you. Thank you, thank you. Um, let me shut this door.

SCRUGGS: Sure. I got some uh...really good satellite stuff. We're gonna use this in the McINTOSH trial. These are KATRINA trials. I'll be happy to...

BALDUCCI: Mm-hmm.

SCRUGGS: ...share all this with you. Uh...

BALDUCCI: Thank you. That's good, good image quality isn't it.

SCRUGGS: Damn sure is. Uh, and (UI) the clients' home is here.

BALDUCCI: Mm-hmm. Oh yeah.

SCRUGGS: Alright? Uh, their experts say there was no wind damage there.

BALDUCCI: Mm-hmm.

SCRUGGS: It was just very mild winds.

BALDUCCI: Mm-hmm.

SCRUGGS: This is in, almost in Gulfport and so, it's called the Biloxi

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River there.

BALDUCCI:

Mm-hmm.

SCRUGGS:

Alright there on that point. All these blue roofs are tarps That FEMA handed out...

BALDUCCI:

(sniffs)

SCRUGGS:

... to sub contractors..on the take.

BALDUCCI:

Oh really.

SCRUGGS:

So greed is helping us on this case.

BALDUCCI:

Mmm, yeah, yeah. That's great isn't it?

SCRUGGS:

(UI) uh, the, the...

BALDUCCI:

Yeah. So.

SCRUGGS:

...CORPS, the CORPS of ENGINEERS, I'm sorry...

BALDUCCI:

Yeah.

SCRUGGS:

...handed 'em all out.

BALDUCCI:

Well that ain't water way back there, is it?

SCRUGGS:

No.

BALDUCCI:

Mm-hmm.

SCRUGGS:

The more than half these, well I mean...

BALDUCCI:

Roofs were blown off, yeah.

SCRUGGS:

...yeah, well sure. And...

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BALDUCCI : Sure.

SCRUGGS : ...and uh, slabs on both sides and one of the interesting things they also did. This is an earlier photograph. This is...

BALDUCCI : Mm-hmm.

SCRUGGS : ...October, before they got 'em all out. The one's this is the water depth and the redder, the shallower.

BALDUCCI : Oh.

SCRUGGS : And this is the client's home here.

BALDUCCI : Wow.

SCRUGGS : So it's gotta come over all the you know what I mean, there's no way surge builds up over shallow water like that.

BALDUCCI : Mm-hmm.

SCRUGGS : (UI)

BALDUCCI : Mm-hmm. That's good stuff, DICK.

SCRUGGS : It's real good stuff.

BALDUCCI : That's real, when's that trial?

SCRUGGS : Uh (sighs), February right now. We, we got LISANBY coming up, which is...

BALDUCCI : Yeah, sure, sure.

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SCRUGGS: ...where I needed the Jury help...

BALDUCCI: Sure. Yeah.

SCRUGGS: ...in uh December and we'll have the same kind of stuff there. It's just as shallow and just as uh, you can see the client's house here.

BALDUCCI: Mm-hmm.

SCRUGGS: House next door is a slab. This house got hammered.

BALDUCCI: Wow. Was that a cul de sac right there?

SCRUGGS: (UI) It's a cul de sac. Yeah.

BALDUCCI: Yeah? So they're at the tip of the cul de sac? Wow. That ought to be...

SCRUGGS: (UI) these are fairly new...

BALDUCCI: ...impressive

SCRUGGS: ...well constructed homes in here too.

BALDUCCI: Mm-hmm. Yeah, that's all rebuild.

SCRUGGS: Mm-hmm. Well, I mean, it's brand new. I mean, before KATRINA.

BALDUCCI: Oh, oh, oh. Just new construction?

SCRUGGS: (talking simultaneously) (UI) KATRINA. Yeah.

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BALDUCCI: I see. It wasn't anything there.

SCRUGGS: Most of these are, are, are, are new, you know, high end kind of homes, but uh, you see the golf course there. You know, that kind of thing. This is, it's a hell of lot better shit than you can get on GOOGLE Earth or...

BALDUCCI: Oh yeah.

SCRUGGS: ...uh...

BALDUCCI: Who did those for you? Just some private satellite?

SCRUGGS: Uh, RICK CROWSEY (phonetic). Yeah, he's a guy that's helped us a lot. CROWSEY INCORPORATED?

BALDUCCI: Mm-hmm.

SCRUGGS: If you need anything...

BALDUCCI: Virginia. Yeah. He's the guy?

SCRUGGS: ... (UI). He is one smart son of a bitch. And if you need anything electronic or...

BALDUCCI: Mm-hmm.

SCRUGGS: ...I mean he, he is, plus he's very much on our side.

BALDUCCI: Great.

SCRUGGS: He knows every database and everybody that runs one in the, in the country.

BALDUCCI: That's great.

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SCRUGGS: And this came from that uh, from that satellite.

BALDUCCI: Hmm. That's great stuff.

SCRUGGS: (UI)

BALDUCCI: Great stuff. Um...

SCRUGGS: (UI) show you (UI)

BALDUCCI: ...alright, well let me um, just very quickly with you, I need to talk to you about the JOHNNY JONES order business, ok?

SCRUGGS: Alright.

BALDUCCI: Um, you know, I came by here about...

SCRUGGS: Right.

BALDUCCI: ...a week or ten days ago and I dropped off an order that was to be entered That the judge had given me and what was supposed to happen was he was supposed to...well he did... give it to MONETTE, his court administrator, and she's supposed to file it in her due course. It was gonna show up in court file and everything was gonna be hunky dory. Well, before that could happen, DICK, GRADY filed a bunch of stuff that hit his desk, ok? So, it, everything's ok though. Everything's fine. He's got it, got it handled...

SCRUGGS: Uh-huh.

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BALDUCCI: ...got it fixed, but what he, what he had to do was, he had to pull that order down that he had originally drafted.

SCRUGGS: Alright.

BALDUCCI: And he drafted a new order now that he added some language to to contemplate GRADY's most recent filing, having reviewed that, taken it into consideration. Basically, that stuff beat, beat the court file. Beat it to the court file before his order did. So he pulled back that other order and has drafted this new one that I want to show you. And what he told me, I met with him...

SCRUGGS: I'm sorry you came all over here for this.

BALDUCCI: No, that's ok. Listen, he, he, uh, well he called me, asked me to come down this mornin'...

SCRUGGS: Mm-hmm.

BALDUCCI: ...to, 'cause he wanted to go over this with me. Now, this is essentially the same order as the one I brought by last week. But what he's done is he's added this paragraph, DICK, to it that talks about the recent filings and he wanted to know from me was that ok. And frankly, I didn't know because I didn't, I don't have the, you know, the institutional knowledge of the case, and so I needed to get it cleared before I told him to go ahead with it.

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So read it and tell me if that, if that's ok, that language. And we can do it however we wanna do it, he said, just... you know he'll, he'll put it in whatever form we need. I just need to get it right this time.

(pause) (door opens and closes)

SCRUGGS: That was ZACH. Now this...

BALDUCCI: Ok.

SCRUGGS: ...this has a kind of a, that last sentence is not really a sentence.

BALDUCCI: Mm-hmm.

SCRUGGS: Doesn't matter. That the actions of the plaintiffs, contrary to the clear meaning of the contract between the parties...I think he needs a colon there, but that's...

BALDUCCI: Ok.

SCRUGGS: Am I readin' it right?

BALDUCCI: (reading to himself)...chose to disregard the clear language and intent of the venture agreement and filed the actions sub judice.

SCRUGGS: (UI) last sentence?

BALDUCCI: That the actions of the plaintiff is contrary...it should say are contrary to the clear meaning of the contract between the parties.

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SCRUGGS: (UI) yeah.

BALDUCCI: Ok.

SCRUGGS: That's all.

BALDUCCI: Just, ok, but...

SCRUGGS: Otherwise, it's...

BALDUCCI: Otherwise, is that what you, is that acceptable?

SCRUGGS: Sure. Yeah.

BALDUCCI: That's, that's good...

SCRUGGS: Yeah.

BALDUCCI: ...then? Ok that's what we want.. I just wanna make sure that's what, that's what we want. Ok. Um, so you want me to go ahead then and get this order...no no problems with having this entered?

SCRUGGS: No. No problems at all.

BALDUCCI: Ok. Alright, the other thing relative to that, and I know I keep going back and forth about this DICK, and I'm sorry, um, he's a little bit, you know, he's a little bit nervous with that last filing by GRADY, 'cause he thinks, you know, they've made a decent argument and all of that, and he's gonna do this, but he says he thinks he's a little more exposed on the facts and the law than he was before and did I think that you would do a little something else, you know, to 'bout ten or so more?

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UF9: (door opens) Governor MINTER of Delaware is on the phone?

SCRUGGS: I'll call him back.

UF9: Ok.

SCRUGGS: (UI)

BALDUCCI: That's fundraisin' it sounds like.

SCRUGGS: (UI) shit.

BALDUCCI: Anyway...

SCRUGGS: Don't know who that is.

BALDUCCI: ...and, and I think I can get us around it, but do you want me to cover that or not?  
(sighs)

SCRUGGS: (pause) Hmmm.

BALDUCCI: Because I've already, you know, I've already taken care of everything and I'm just...

SCRUGGS: Uh, I'll take care of it. Uh, I need a, I need uh, some suggested uh...

BALDUCCI: Well...

SCRUGGS: ...voir dire from you.

BALDUCCI: Well here's what I thought. I'm already doing the voir dire for you and what I thought I could do...

SCRUGGS: You just enjoy doing that, don't you?

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BALDUCCI: Yeah, well what I thought I could do is do some jury instructions in addition to that.

SCRUGGS: Good.

BALDUCCI: And uh, I'll do your jury instructions.

SCRUGGS: You might wanna look at the ones that uh, that were already that were used before...

BALDUCCI: Right.

SCRUGGS: ...uh, which are probably on PACER (phonetic) uh, in the uh, in the case that our buddy MERKEL tried.

BALDUCCI: Yeah, I got it. I mean, I've got, that was the voir dire...

SCRUGGS: And use that...

BALDUCCI: ...so I can...

SCRUGGS: ...as a, at the beginning.

BALDUCCI: Yeah. I can use that as a template.

SCRUGGS: Yeah.

BALDUCCI: Um, that's probably worth about ten, don't you think? Doing those jury instructions?

SCRUGGS: It'd sure help.

BALDUCCI: Yeah, that's what I figured. Ok, um, can I just get with TIM CANTRELL on that?

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SCRUGGS: Uh, yeah. Why don't you just uh, send me uh...

BALDUCCI: A little engagement letter like that on that?

SCRUGGS: ...yeah.

BALDUCCI: Yeah.

SCRUGGS: Yeah, on both, on both issues.

BALDUCCI: Well, you sent me one on the other. Remember? You sent me one on the...

SCRUGGS: Oh, did I?

BALDUCCI: ...on the uh...

SCRUGGS: I didn't know it was an engagement letter (UI) something like (UI)

BALDUCCI: ...for the voir dire.

SCRUGGS: Yeah.

BALDUCCI: You sent me, I've got one on that already that you sent me.

SCRUGGS: Yeah, I, I, what, what I'll do is amend it to include uh, instructions (UI)

BALDUCCI: Jury instructions. I think that...

SCRUGGS: Everybody here is so busy doing other things...

BALDUCCI: Sure. Of course.

SCRUGGS: ...ju, jury instructions are, you know, the last thing you

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think of...

BALDUCCI: They're awfully important.

SCRUGGS: Take a look if you would at the local rules down there to see when they have to be exchanged in state court, uh, you know what I mean..or?

BALDUCCI: Sure.

SCRUGGS: I don't wanna give 'em any excuse. They're trying like hell to get out of this trial.

BALDUCCI: I'll take care of it for ya.

SCRUGGS: I mean, we're pulling down experts. We're saying, you know we, we want close to battle.

BALDUCCI: Yeah.

SCRUGGS: Uh, I don't, you know.

BALDUCCI: I understand. Well um, you, you want me to just send you a little confirmatory letter or you wanna...

SCRUGGS: No, I'll, I'll do it.

BALDUCCI: You'll do one?

SCRUGGS: I'll, I'll do it today.

BALDUCCI: Ok.

SCRUGGS: I'll send you a uh...

BALDUCCI: Alright.

SCRUGGS: ... (UI) with a copy to TIM.

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BALDUCCI: With a copy to TIM.

SCRUGGS: Mm-hmm.

BALDUCCI: Good enough. Good enough.

SCRUGGS: It's like uh, it, it, the last letter I sent was good enough?

BALDUCCI: That was fine, as far as I'm concerned. Perfect for me.

SCRUGGS: Good.

BALDUCCI: Um, alright, the only other thing I wanted to ask you is, I hadn't talked to you since all this shit broke loose, you know, after Kentucky and we came over here that day and all. Are we ok? I mean...

SCRUGGS: Oh, fuck yeah.

BALDUCCI: Ok. That, that's all I wanna know...

SCRUGGS: (UI) Fuck yeah.

BALDUCCI: ...is just are, we, we're ok. Alright.

SCRUGGS: Yeah.

BALDUCCI: I just, I told ZACH and SID, I, I, you know, I said I feel like...

SCRUGGS: Just (UI)

BALDUCCI: ...I feel like ya'll have gotten caught in the crossfire of a pissin' match...

SCRUGGS: We're... (UI) ...That's all.

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(UI)

BALDUCCI: You know, JOEY's trying to piss...

SCRUGGS: (UI)

BALDUCCI: ...piss down our leg.

SCRUGGS: But neither one of ya'll need to be...

BALDUCCI: And um...

SCRUGGS: ...spendin' brain time on that. You got your own...

BALDUCCI: Well, I'm not. I'm not. I just feel like, you know, like we said that other day...

SCRUGGS: I know.

BALDUCCI: ...I just feel like, eh, you know, he's just continues to shoot at us, but I just wanna, I'm sorry ya'll have gotten knocked out of the saddle in this.

SCRUGGS: I'm not...

BALDUCCI: And I don't want, I'm, I'm...

SCRUGGS: ...I'm not, I didn't have time...

BALDUCCI: Ok.

SCRUGGS: ...uh to foll with it.

BALDUCCI: Well, I just want you to...

SCRUGGS: (UI) If they, they can find a, you know, a better solution

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now, tell 'em to go for it.

BALDUCCI: Ok. Ok, buddy. Um, I just don't want you upset with us. I feel like, you know, indirectly it's our fault for...

SCRUGGS: No, no, it's not.

BALDUCCI: ...for getting you knocked out of this.

SCRUGGS: No. I appreciate your, your, your, uh, sympathy on it (laughs). Uh, you know, when uh...

BALDUCCI: (sighs)

SCRUGGS: ...it, it, it's uh, not unlike uh, people who get divorced. I mean, friends of both of 'em and you don't wanna, you know...

BALDUCCI: Sure.

SCRUGGS: ...you wanna maintain relationships and, without aggravating it. You know what I mean.

BALDUCCI: I understand. I understand.

SCRUGGS: Uh.

BALDUCCI: Well, I just don't want it to adversely affect us.

SCRUGGS: Yeah. I, I mean I think, I think uh, I think JOEY is uh, first of all, I think he's wrong in you know, fucking around with it instead of doing his own thing.

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BALDUCCI: Yeah.

SCRUGGS: Uh...

BALDUCCI: I wish that's what he would do.

SCRUGGS: ...and, and secondly, uh, he's also wrong that uh, somehow you or STEVE are using his friendships and his relationships and contacts when in fact, STEVE is the one that uh, arranged that...

BALDUCCI: Sure.

SCRUGGS: ...and uh...

BALDUCCI: In the beginning.

SCRUGGS: And uh, owe you a hell of a lot for your help in the uh...

BALDUCCI: Oh, you don't owe me anything.

SCRUGGS: ...in all the MERKEL stuff. I mean, no I didn't (UI)

BALDUCCI: (talking simultaneously) Shit, man, (UI) you don't owe me anything.

SCRUGGS: (UI) I know who did the fucking work.

BALDUCCI: Yeah, well, I mean I was glad to do it. Glad to do it. Um, alright. Well, I won't bother you anymore about that. And uh...

SCRUGGS: You work too damn hard, man.

BALDUCCI: Now. Just tryin' to get business, business handled as

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business needs to get handled,  
DICK. You know how that is.  
Thank you my man. I appreciate  
you...

SCRUGGS: Thank you.

BALDUCCI: ...very, very much and uh,  
listen, if you need me for  
anything...

SCRUGGS: Jury instructions and uh, and  
it wouldn't hurt to uh...

BALDUCCI: Will you...

SCRUGGS: ...I'll have uh, somebody email  
you the uh, the instructions  
that were issued and those that  
were proposed and rejected  
and...

BALDUCCI: Sure.

SCRUGGS: ...marked up or whatever, you  
know how that works.

BALDUCCI: Sure.

SCRUGGS: Uh...

BALDUCCI: If you'll just uh...

SCRUGGS: And uh...

BALDUCCI: ...send that over, I'll get  
this other deal wrapped up.

SCRUGGS: Go for it.

BALDUCCI: Appreciate you, man.

SCRUGGS: Thank you.

BALDUCCI: Thank you. See ya. Bye VICKI.



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SPECIAL AGENT (SA) WILLIAM P. DELANEY: You all set?

BALDUCCI: Yeah.

DELANEY: Go ahead and get this thing shut off. Go ahead and say the time.

BALDUCCI: Uh, it's uh, almost 3:00, about 2:58 central time, October 1st, uh, excuse me, November 1st.

(END OF RECORDING)