## SUBPOENA DUCES TECUM



THE STATE OF MISSOURI. To	Honeywell Corpora	ation (*)	
	in a ma	tter pending	
You are hereby commanded to be a			
Missouri nx nnx fonnnissimmenthex	on the 17th	day ofJuly	, 2006 at
773	O Carondelet Ave., Sui	te 200	•
o'clock of that day, at St.	Louis, MO 63105	in the County ofSt.	Louis,
in the State of Missouri, to testify at	deposition a karage in the matter of :_	USW 11-6 v. Laclede G	as Company,
PSC No. GC-2006-0390		·	
And that you bring with you and pr	deposition oduce at said XXXXXX	SEE ATTACHMENT A	
on behalf of USW 11-6 this writ is commanded to have the s Given under my hand, this	same at the time and place afo	presaid, certifying thereon its r	
[Name]	[Title]		<del></del> ,
	RETURN		ta ca
I HEREBY CERTIFY that I have se	rved the within writ by readin	g the same in the presence and	i hearing of the
within named		•	
	County, in the State of M	ISSOUTI.	
[Name]	[Title]		

## ATTACHMENTS TO SUBPOENA DUCES TECUM

Honeywell Corporation

- (\*) Representative produced at deposition needs to be able to testify knowledgeably about the following subjects:
- 1. Honeywell's hiring practices with regard to personnel to install and supervise installation of automatic meter reading ("AMR") devices on residential gas meters served by Laclede Gas Company;
- 2. Honeywell's training of the above-referenced installers and supervisors;
- 3. Any requirements or other input about hiring or training received from Laclede Gas Company or Cellnet Technology, Inc.
- 4. Problems identified by installers, customers or Laclede Gas Company about the above-referenced installation or training.

## Attachment A

List of documents to be provided at deposition of Honeywell Corporation representative:

- 1. All job postings issued by or on behalf of Honeywell Corporation for supervisors or installers of AMR devices on gas meters;
- 2. Job applications and wage withholding forms for all persons hired by or on behalf of Honeywell Corporation for supervisors or installers of AMR devices on gas meters;
- 3. All correspondence and other documents to or from Manpower, Inc. and other temporary employment agencies concerning the hiring of supervisors or installers of AMR devices on gas meters, including but not limited to documents reflecting the names, addresses and qualifications of the applicants, and documents setting forth the terms and conditions of employment;
- 4. All training manuals and other training materials used in the instruction of supervisors or installers of AMR devices on gas meters;
- 5. All gas leak detectors, first-aid equipment, tools and other equipment provided to installers of AMR devices on gas meters;
- 6. All call logs and other records of leaks, unfinished installations and other problems identified with the installation of AMR devices on gas meters, regardless of whether the information was obtained from installers, customers, Laclede Gas Company, Cellnet Technology, Inc., Manpower, Inc. or another temporary employment agency.