

Exhibit A

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 08-10152-JMP

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In the Matter of:

QUEBECOR WORLD (USA) INC., et al.

Debtors.

- - - - -x

U.S. Bankruptcy Court
One Bowling Green
New York, New York
June 28, 2011
10:16 AM

B E F O R E :
HON. JAMES M. PECK
U.S. BANKRUPTCY JUDGE

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2 **Status Conference**

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25 **Transcribed by: Karen Schiffmiller**

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1 possibility of a subpoena or a deposition. I'm assuming
2 written discovery is going to get resolved because we've got
3 everything out on the table that we think we need.

4 But the debtors have taken the position that in -- you
5 know, when we go back to November, Judge, when we presented the
6 motions initially to you and the similarity of the issues
7 between Texas and Arizona, and we discussed at that time, and
8 we made a decision that these would proceed together, and we
9 entered into a stipulation and consent order that provided a
10 schedule for these matters to continue together. And indeed,
11 it makes sense because there are many common legal and factual
12 issues.

13 Many of the same people are involved in terms of
14 discussing nexus. Many of the same people are involved in
15 terms of discussing the tax compliance program and the amount
16 of the taxes due as between the states. You know, my
17 understanding of what the Court did was, basically implement a
18 jointly consolidated proceeding that would proceed together,
19 and we'll figure it out when we go to trial how to try the
20 case, but certainly the discovery would be conducted together
21 for the sake of efficiency; makes no sense for us to
22 independently call a witness who is the same witness that
23 Arizona might want to call.

24 Now subsequently, the debtors have taken the position
25 that under the federal rules, we are limited to ten

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1 depositions. Our position has been that ten depositions,
2 especially of the nature that we're talking about, if we have
3 to conduct a bunch of half-hour customer deposition, is not
4 sufficient. Judge, I never asserted or asked for 400
5 depositions. I did ask the debtors to agree over a planning a
6 period, because I need to plan what my discovery is going to
7 be, an additional ten depositions.

8 Now, I would note for the Court, that the Court has
9 entered a claims objection procedures order that provides that
10 each separate claim objection is a separate contested matter.
11 So, you know, I'm not here to argue technically what we are or
12 are not entitled to; I think we're certainly entitled to at
13 least forty, because there are four claims and claims
14 objections before the Court, but, I'm not even asking for that.
15 I'm asking for a reasonable amount, I think, that will
16 accomplish the discovery that is needed to complete the
17 discovery and prepare the case for trial.

18 So, that's an open issue that we're discussing;
19 debtors' counsel have not refused to allow my request. They
20 simply at this point have not agreed -- or proposed -- any
21 amount for me to plan around. So, I need to know the answer to
22 certain questions to plan the next 120 days. And so that's one
23 of the other issues that's pending, that's been outstanding,
24 that relates to the discovery that needs to be resolved.

25 Now with that, Your Honor, I am basically in agreement

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1 with the debtors' position, certainly with reservation of right
2 to respond and react as we learn through investigation of
3 discovery what this case is more about. But with that, I
4 essentially do not disagree with Mr. Canning.

5 THE COURT: Okay, I understand from what you've said
6 that there are three areas that remain open and unresolved,
7 although you are in fundamental agreement with the basic
8 outlines and contours of the proposal made.

9 One is, the July 1, 2007 date is a date that you view
10 should be without prejudice to looking back further in time for
11 cause shown; that there is some open issues with respect to the
12 confidentiality stipulation, but there's no disagreement as to
13 the appropriateness of such a stipulation, and that the number
14 of depositions remain outstanding in terms of your view and the
15 debtors' view.

16 Do I understand your position?

17 MR. HURST: Yes, Your Honor, that's --

18 THE COURT: Okay, I'll hear from Arizona.

19 MS. THEIS: Thank you, Your Honor.

20 As Mr. Hurst --

21 THE COURT: Your should -- having moved it, you should
22 talk into it; maybe you can just bend it down a little bit. Is
23 it going to fall over?

24 MS. THEIS: It is. Yes.

25 THE COURT: Do you want to help?

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