

EXHIBIT H

In The Matter Of:

In re: ADELPHIA COMMUNICATIONS CORPORATION, et al.,

CAROL V. SAVAGE

October 13, 2005

LEGALINK MANHATTAN
420 Lexington Avenue - Suite 2108
New York, NY 10170
PH: 212-557-7400 / FAX: 212-692-9171

SAVAGE, CAROL V. - Vol. 1



Page 150

1 CAROL V. SAVAGE
 13:54:39 2 Q. Do you have any personal
 13:54:41 3 knowledge of Adelphia's business
 13:54:43 4 activities prior to the petition date?
 13:54:45 5 A. The cable business, no, I do
 13:54:47 6 not.
 13:54:47 7 Q. Or any of Adelphia's
 13:54:49 8 particular business transactions?
 13:54:50 9 A. No.
 13:54:51 10 Q. So if someone was called to
 13:54:52 11 testify about a Rigas transaction that
 13:54:54 12 occurred in 2000, you have no personal
 13:54:56 13 knowledge of that?
 13:54:57 14 A. No.
 13:54:59 15 Q. I'm going to ask you a few
 13:55:00 16 questions, I think I know what the
 13:55:02 17 answers are going to be, which are
 13:55:03 18 going to be your nonanswers, but how
 13:55:06 19 did you prep for this deposition?
 13:55:08 20 A. I really did not, other than
 13:55:11 21 I was here yesterday and talked to Brian,
 13:55:20 22 and that's about it. And then I looked
 13:55:22 23 at a couple of the issue summaries, but
 13:55:24 24 that's it.
 13:55:24 25 Q. What did Brian say to you?

Page 151

1 CAROL V. SAVAGE
 13:55:25 2 MR. O'CONNOR: Objection.
 13:55:27 3 Direction not to answer.
 13:55:30 4 MR. SHORE: On which basis?
 13:55:32 5 MR. O'CONNOR: I'm
 13:55:32 6 representing the witness. On attorney/
 13:55:34 7 client privilege basis.
 13:55:35 8 Q. Are you going to follow your
 13:55:37 9 counsel's instruction? Yes is the
 13:55:39 10 answer to that.
 13:55:40 11 A. Yes.
 13:55:40 12 Q. Okay.
 13:55:41 13 MR. SHORE: I take it, Brian,
 13:55:43 14 that you're going to instruct her not to
 13:55:45 15 answer any questions regarding any legal
 13:55:49 16 advice or work product you shared with
 13:55:51 17 the witness during any prep session?
 13:55:54 18 MR. O'CONNOR: I can tell
 13:55:55 19 you we didn't share any legal advice or
 13:55:57 20 work product with the witness during
 13:55:59 21 the preparation session.
 13:56:02 22 MR. SHORE: Then what's the
 13:56:03 23 basis for the objection and instruction
 13:56:05 24 not to answer on attorney/client
 13:56:08 25 grounds?

Page 152

1 CAROL V. SAVAGE
 13:56:08 2 MR. O'CONNOR: I don't
 13:56:09 3 typically allow my witnesses to answer
 13:56:11 4 questions about their preparation with
 13:56:12 5 me.
 13:56:13 6 MR. SHORE: So the objection
 13:56:14 7 is not attorney work product, it's Brian
 13:56:17 8 typically doesn't allow it?
 13:56:18 9 MR. O'CONNOR: If you want
 13:56:18 10 to take the position -- I shouldn't say
 13:56:20 11 that. I should say I did not share any
 13:56:23 12 attorney/client privileged communication.
 13:56:24 13 If you want to characterize the session
 13:56:26 14 as work product, then it's work product.
 13:56:29 15 MR. SHORE: So we've got
 13:56:30 16 work product. I will put on the record
 13:56:32 17 we're going to object to any allocation
 13:56:33 18 of fees for any preparation of any
 13:56:35 19 witness to the Adelphia or the Arahova
 13:56:38 20 estate in this process if you're going
 13:56:40 21 to take the position we're not entitled
 13:56:42 22 to know what the prep is about.
 13:56:47 23 MR. O'CONNOR: You can take
 13:56:48 24 whatever position you would like.
 13:56:50 25 MR. SHORE: I don't want it

Page 153

1 CAROL V. SAVAGE
 13:56:51 2 to be a surprise to you at a later date.
 13:56:53 3 MR. O'CONNOR: Nothing you
 13:56:54 4 would do, Chris, would be a surprise.
 13:56:58 5 MR. SHORE: Maybe, maybe
 13:56:59 6 not.
 13:56:59 7 Q. I will ask a number of other
 13:57:01 8 questions just to lay a foundation.
 13:57:02 9 It's not a dispute involving you, it's
 13:57:04 10 a dispute involving the lawyers and
 13:57:06 11 you're going to get I believe some
 13:57:08 12 instructions. At any time during your
 13:57:11 13 tenure at Adelphia were you advised by
 13:57:15 14 counsel as to the Bankruptcy Code and
 13:57:18 15 the effects of the Bankruptcy Code on
 13:57:20 16 any of the debtors?
 13:57:22 17 MR. O'CONNOR: That calls
 13:57:23 18 for a yes or no answer. You can answer
 13:57:24 19 that.
 13:57:25 20 A. No.
 13:57:26 21 Q. Do you recall counsel ever
 13:57:29 22 advising you as to the automatic stay
 13:57:31 23 provisions of the Bankruptcy Code?
 13:57:40 24 A. Not counsel. I mean we had
 13:57:42 25 to have an understanding of what -- how