

# **EXHIBIT A**

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UNITED STATES BANKRUPTCY COURTSOUTHERN DISTRICT OF NEW YORK

-----xIn re:

Chapter

ADELPHIA COMMUNICATIONS Case No.:

CORPORATION, et al., 02-41729 (REG)

Debtors.-----x

October 13, 2005

9:45 a.m.

Deposition of CAROL V. SAVAGE,  
pursuant to notice, at the offices of  
Willkie Farr & Gallagher LLP, 787 Seventh  
Avenue, New York, New York, before Gail F.  
Schorr, a Certified Shorthand Reporter,  
Certified Realtime Reporter and Notary  
Public within and for the State of New York.

1 CAROL V. SAVAGE

2 form.

3 A. Just as the adjustments were  
4 made, I mean.

5 Q. Okay.

6 A. They were clearly material.

7 Q. Could you go back to Savage  
8 14, please. Now I understand this is a  
9 draft, but if you turn to Page 6, which  
10 is marked 1617 or 198016 on the bottom  
11 right, it's Page 6 of the presentation.  
12 If you look under the bullet point  
13 "restatement work" down three dashes  
14 and down two more bullet points.  
15 Actually, if you review to yourself all  
16 of the entries under restatement work.  
17 Do you see that?

18 A. Yes.

19 Q. I'm going to refer you to  
20 under restatement work, under the third  
21 dash, second bullet point, it says  
22 "Impact on the intercompany balances  
23 from these efforts is not expected to  
24 be material." Based upon your review,  
25 and I take it for what it's worth that

1 CAROL V. SAVAGE  
2 you're looking at this for the first  
3 time, is that an accurate statement of  
4 your team's view as of December 2003,  
5 or September 2003?

6 A. We did not focus on that  
7 particular concept. I mean we were  
8 trying to make the proper adjustments  
9 regardless of what entity they  
10 affected. I mean that was never a  
11 consideration as to who was being  
12 helped or who was being hurt. I mean  
13 we just wanted to get it right.

14 And so to be honest with  
15 you, I don't know what the numbers are  
16 but I presume that they're material or  
17 we wouldn't be sitting here.

18 Q. I was just trying to place  
19 it in time. You said who was being  
20 helped and who was being hurt. Are you  
21 aware of whether anybody, any employee  
22 of the debtor was charged with the job  
23 of figuring out who was being helped  
24 and who was being hurt, who was  
25 responsible for that?

12/15/2005 Appaloosa 30(b)(6) - Goldstein

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UNITED STATES BANKRUPTCY COURTSOUTHERN DISTRICT OF NEW YORK

-----xIn re:

Chapter 11

ADELPHIA COMMUNICATIONS Case No.:

CORPORATION, et al., 02-41729 (REG)

Debtors.-----x

December 15, 2005

11:13 a.m.

Videotaped deposition of RONALD M.  
GOLDSTEIN, pursuant to notice, at the  
offices of Willkie Farr & Gallagher LLP,  
787 Seventh Avenue, New York, New York,  
before Gail F. Schorr, a Certified Shorthand  
Reporter, Certified Realtime Reporter and  
Notary Public within and for the State of  
New York.

1 RONALD M. GOLDSTEIN

2 statement, I'll leave it where you --

3 A. I think -- I think the outcome  
4 speaks for itself.

5 Q. It was a good outcome?

6 A. Yes.

7 Q. Why?

8 A. Am I allowed to answer that  
9 question? An opinion as to --

10 MR. ZINMAN: If it's your  
11 opinion.

12 A. It's my opinion not an opinion  
13 of anybody -- okay. My opinion, okay. I  
14 believe it maximized the value of the  
15 assets of the companies assuming that the  
16 allocation of that value is going to be  
17 done in a fair and equitable manner to  
18 each estate, which to date is still a  
19 question mark.

20 So I don't have an issue with  
21 respect to the bid procedures and the  
22 process and the outcome, I think it was  
23 all favorable and executed well. But I do  
24 have an issue with the allocation of that  
25 value amongst the estates.