

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 23-11069 (CTG)
)

) (Jointly Administered)
)

**THE NEW ENGLAND TEAMSTERS PENSION FUND’S AND CENTRAL
PENNSYLVANIA TEAMSTERS DEFINED BENEFIT PLAN’S
AMENDED NOTICE OF DEPOSITION OF THE DEBTORS PURSUANT
TO RULE 30(B)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE
RELATED TO DEBTORS’ SEVENTH OMNIBUS (SUBSTANTIVE)
OBJECTION TO PROOFS OF CLAIM FOR WITHDRAWAL LIABILITY**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure (the “Federal Rules”), made applicable to the above-captioned chapter 11 cases by Rule 9014 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), the New England Teamsters Pension Fund (“NETTI”) and the Central Pennsylvania Teamsters Defined Benefit Plan (“Central PA Teamsters”), by and through their undersigned counsel, will take the oral deposition under oath of Robert T. Campbell, designated by the Debtors as the most knowledgeable to testify on the Debtors’ behalf with respect to the topics listed in Exhibit A, attached hereto.

The deposition will commence at 9:00 am ET on Monday, September 9, 2024, via Zoom, or at such other time and place as may be agreed to among counsel for the parties, and will continue for the maximum time permitted under applicable rules and may, for good cause, be extended. The deposition will be taken before a qualified notary public or some other officer authorized by law to administer oaths and will be recorded by stenographic, video, and audio means. NETTI

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

and Central PA Teamsters reserve the right to use the videotape recording at any proceeding in lieu of live testimony from the deponent in accordance with applicable law.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), the Debtors must designate one or more witnesses to testify as to the topics set forth in **Exhibit A**, attached hereto. The Debtors reserve the right to seek relief in the event that the designated deponent is not properly prepared to testify on the Debtors' behalf with respect to the identified topics.

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Dated: August 30, 2024
Wilmington, Delaware

/s/ Cory D. Kandestin

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Benefit Plan*

EXHIBIT A

DEFINITIONS

The following definitions shall apply to the terms used below, regardless of whether they are capitalized or uncapitalized:

1. The terms “all,” “each,” and “any” shall be construed to mean all, each, every, any, “each and every,” and “any one.”

2. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

3. The terms “Debtors,” “You,” and “Your” mean the debtors in the above-captioned chapter 11 proceeding, and any Affiliates, agents, assigns, directors, employees, officers, parents, partners, representatives, subsidiaries, or any other Persons acting or purporting to act on their behalf, and any predecessor or successor of the foregoing. Where appropriate, the term “Debtors” shall refer to the Debtors’ predecessors-in-interest during the Relevant Period.

4. “Including” means including but not limited to.

5. “NETTI Plan” means the Complete Rules and Regulations for the New England Teamsters Pension Fund, amended and restated as of January 1, 2022, available at <https://nettipf.com/wp-content/uploads/2023/01/NETPF-Rules-and-Regs-Effective-1-1-2022-FINAL.pdf>.

6. “Objection” means the Debtors’ Seventh Omnibus (Substantive) Objection to Proofs of Claim for Withdrawal Liability [Dkt. No. 2595].

7. “Unfunded Vested Benefits” shall have the meaning set forth in Section 4213(c) of the Employee Retirement Income Security Act of 1974.

8. Any ambiguity shall be construed to bring within the scope of the topic all responses that otherwise could be construed to be outside of its scope.

TOPICS FOR 30(B)(6) DEPOSITION²

TOPIC NO. 1

The Debtors' calculations and/or assessments of the Debtors' withdrawal liability to NETTI, including how the Debtors calculated the plan's Unfunded Vested Benefits, the methodology the Debtors selected for calculating the Debtors' share of any such Unfunded Vested Benefits, how the Debtors applied 29 U.S.C. § 1381(b) to calculate the Debtors' withdrawal liability, and how the Debtors calculated or would have calculated the Debtors' annual withdrawal liability payment, including how the Debtors selected or would have selected the highest contribution rate and the contribution base units used in the calculation of the Debtors' annual withdrawal liability payment.

TOPIC NO. 2

The Debtors' contribution history to NETTI.

TOPIC NO. 3

Your agreement to comply with the NETTI Plan, including in any collective bargaining agreements governing Your employees.

TOPIC NO. 4

The Debtors' calculations and/or assessments of the Debtors' withdrawal liability to Central PA Teamsters, including how the Debtors calculated the plan's Unfunded Vested Benefits,

² The deposition noticed hereby is without prejudice to NETTI's or Central PA Teamsters' right to serve additional discovery requests or notices on the Debtors in connection with the Objection, or in any other contested matter, adversary proceeding, or case. Terms not otherwise defined shall have the meaning ascribed to them in the *Debtors' Seventh Omnibus (Substantive) Objection to Proofs of Claim for Withdrawal Liability* [Dkt. No. 2595] or *New England Teamsters Pension Fund's Response to Debtors' Seventh Omnibus (Substantive) Objection to Proofs of Claim for Withdrawal Liability* [Dkt No. 3058], as applicable. NETTI and Central PA Teamsters reserve all rights.

the methodology the Debtors selected for calculating the Debtors' share of any such Unfunded Vested Benefits, how the Debtors applied 29 U.S.C. § 1381(b) to calculate the Debtors' withdrawal liability, and how the Debtors calculated or would have calculated the Debtors' annual withdrawal liability payment, including how the Debtors selected or would have selected the highest contribution rate and the contribution base units used in the calculation of the Debtors' annual withdrawal liability payment.

TOPIC NO. 5

The Debtors' contribution history to Central PA Teamsters.