IN THE COURT OF COMMON PLEAS OF LORAIN COUNTY, OHIO

FILED LORAIN COUNTY Will AUG -9 P 1: 33

COUNTER CUITMAN LEAS TON ORLANDO

GIBSON BROS., INC., et al.,
Plaintiffs,

vs.

Case No. 17CV193761

OBERLIN COLLEGE, etc., et al., Defendants.

Videotaped Deposition of JASON HAWK

~~~~~~~~~~~~~~~~~~~

Wednesday, June 27, 2018
10:10 a.m.

Taken at:

Wickens, Herzer, Panza, Cook & Batista
35765 Chester Road
Avon, Ohio

Michelle L. Harper, RPR

| Page 2                                                                     | Page 4                                                                                                           |
|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| 1 APPEARANCES:                                                             | 1                                                                                                                |
| On behalf of the Plaintiffs:     Krugliak, Wilkins, Griffiths & Dougherty, | 2 (Thereupon, Hawk Deposition Exhibits 1 and 2 were                                                              |
| 3 Co., L.P.A., by<br>OWEN J. RARRIC, ESQ.                                  | 3 marked for purposes of identification.)                                                                        |
| 4 4775 Minson Street NW                                                    | 4                                                                                                                |
| P.O. Box 36963<br>5 330.497.0700 ext. 123                                  | 5 VIDEOGRAPHER: On the record, 10:10.                                                                            |
| onaric@kwgd.com<br>6                                                       | 6 JASON HAWK, of lawful age, called for                                                                          |
| 7 On behalf of the Defendants: Taft Stettinius & Hollister LLP, by         | 7 examination, as provided by the Ohio Rules of                                                                  |
| 8 CARY M. SNYDER, ESQ.                                                     | 8 Civil Procedure, being by me first duly sworn, as                                                              |
| RONALD D. HOLMAN, II, ESQ. 9 JULIE A. CROCKER, ESQ.                        | 9 hereinafter certified, deposed and said as                                                                     |
| 200 Public Square, Suite 3500 10 Cleveland, Ohio 44114                     | 10 follows: 10:11:30                                                                                             |
| 216.241.3141                                                               | 11 MR. KESLAR: Counsel, before we begin,                                                                         |
| 11 csnyder@taftlaw.com rholman@taftlaw.com                                 | 12 can I put something on the record?                                                                            |
| 12 jerocker@aftlaw.com<br>13 On behalf of Jason Hawk:                      | 13 MR. HOLMAN: Absolutely.                                                                                       |
| Cory Meredith, by 14 STEVEN A. KESLAR, ESQ.                                | 14 MR. KESLAR: Mr. Hawk is appearing today                                                                       |
| 101 N. Elizabeth Street, 6th Floor                                         | 15 in response to a subpoena issued to him by 10:11:57                                                           |
| 15 Lima, OH 45801<br>419.228.6365                                          | 16 counsel for defendants. Leading up to that, I                                                                 |
| 16 skeslar@corylpa.com<br>And                                              | had some back and forth with counsel for                                                                         |
| 17 Bussian Law Firm, by JOHN A. BUSSIAN, ESQ. (Via Teleconference)         | defendants about some of the privileges that                                                                     |
| 16 150 Fayetteville Street, 17th FL.                                       | 19 Mr. Hawk was intending to enforce today, those                                                                |
| Raleigh, NC 27601<br>19 919.306,3319                                       | 20 privileges being the Ohio Shield Law and Revised 10:12:02                                                     |
| 20 ~~~~~                                                                   | 21 Code 2739.12 and the qualified privileges                                                                     |
| ALSO PRESENT:                                                              | 22 afforded to him by the First Amendment to the                                                                 |
| 22 Mr. Frank Stanek, Videographer                                          | 23 U.S. Constitution, which are also provided to him                                                             |
| 23 Mr. David Gibson<br>Ms. Lysette Roman                                   | 24 by the Ohio Constitution at Article 2, Section                                                                |
| 24 Dr. Meredith Raimondo (via Teleconference) 25                           | 25 1I. 10:12:17                                                                                                  |
| Molner Reporting Services, LLC (440) 340-6161                              | Molnar Reporting Services, LLC (440) 340-6161                                                                    |
| Page 3                                                                     | Page 5                                                                                                           |
| 1 INDEX                                                                    | 1 So Mr. Hawk intends to enforce those                                                                           |
| 2 EXAMINATION OF JASON HAWK                                                | 2 privileges today. With that understanding, we're                                                               |
| 3 BY MR. HOLMAN 5                                                          | 3 ready to proceed.                                                                                              |
| 4                                                                          | 4 MR. HOLMAN: Great. Thank you,                                                                                  |
| 5 EXHIBITS MARKED                                                          | 5 EXAMINATION OF JASON HAWK 10:12:25                                                                             |
| 6 Exhibit 1, Subpoena 4                                                    | 6 BY MR. HOLMAN:                                                                                                 |
| 7 Exhibit 2, Notice of Deposition                                          | 7 Q. Good morning, Mr. Hawk.                                                                                     |
| 8 Exhibit 3, Map Drawn by Jason Hawk 55                                    | 8 A. Good morning.                                                                                               |
| 9 Exhibit 4, E-mail Exchange between 195                                   | 9 Q. Please state your full name for the                                                                         |
| 10 Clyde Owan and Jason Hawk                                               | 10 record. 10:12:56                                                                                              |
| 11                                                                         | 11 A. Jason Richard Hawk.                                                                                        |
| 12                                                                         | <ol> <li>Q. Thank you. The record should reflect</li> </ol>                                                      |
| 13                                                                         | 13 that this is the deposition of Jason Hawk, which                                                              |
| 14                                                                         | 14 is being taken today in the case of Gibson                                                                    |
| 15                                                                         | 15 Brothers, Inc., et al., versus Oberlin College, 10:13:12                                                      |
| 16                                                                         | 16 et al., and the deposition is going forward today                                                             |
| 17                                                                         | 17 pursuant to a subpoena that was served on                                                                     |
| 18                                                                         | 18 Mr. Hawk by and through his attorneys, Cory,                                                                  |
| 19                                                                         | 19 Meredith, Witter & Smith, LPA.                                                                                |
| 20                                                                         | The deposition is also occurring today 10:13:31                                                                  |
| 21                                                                         | 21 pursuant to a notice of deposition of Jason Hawk                                                              |
| 22                                                                         | and the agreement of counsel in this litigation.                                                                 |
| 0.3                                                                        | 23 The subpoena has been marked as Exhibit 1 and the                                                             |
| 23                                                                         |                                                                                                                  |
| 24                                                                         | 24 notice of deposition has been marked as                                                                       |
|                                                                            | 24 notice of deposition has been marked as 25 Exhibit 2. 10:13:48  Molnar Reporting Services, LLC (440) 340-6161 |

|                                                                                                                     | Page 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                          | Page 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                   | Have you ever met David Gibson before?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1                                                                                                                        | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2                                                                                                                   | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2                                                                                                                        | Q. Did you first meet Mr. Gibson in 2018?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3                                                                                                                   | Q. Okay. When did you first meet                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 3                                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4                                                                                                                   | Mr. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4                                                                                                                        | Q. Do you believe you first met Mr. Gibson                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5                                                                                                                   | A. I don't recall. 10:13:58                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 5                                                                                                                        | in 2017? 10:16:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 6                                                                                                                   | Q. Okay. And I should say, too, that if at                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 6                                                                                                                        | A. It's possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 7                                                                                                                   | any point you don't hear a question because my                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 7                                                                                                                        | Q. Okay. Do you believe you met Mr. Gibson                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8<br>9                                                                                                              | voice has dropped, please let me know and I will restate the question. Is that fair?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 8 9                                                                                                                      | in 2016?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10                                                                                                                  | A. Sounds fair. 10:14:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 10                                                                                                                       | A. It's also possible. Q. Okay. What about 2015? 10:16:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 11                                                                                                                  | Q. Okay. And likewise, if you do not                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 11                                                                                                                       | Q. Okay. What about 2015? 10:16:14 A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12                                                                                                                  | understand a question, do not answer it. Is that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 12                                                                                                                       | Q. Okay. 2014?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 13                                                                                                                  | fair?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 13                                                                                                                       | A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 14                                                                                                                  | A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 14                                                                                                                       | Q. Okay. 2013?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 15                                                                                                                  | Q. And, in fact, if you do not understand a 10:14:20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 15                                                                                                                       | A. Also possible. 10:16:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 16                                                                                                                  | question, please ask me to restate it and I'll do                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 16                                                                                                                       | Q. 2012?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 17                                                                                                                  | my best to ask a question that you do understand.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 17                                                                                                                       | A. Also possible,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 18                                                                                                                  | Is that fair?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 18                                                                                                                       | Q. 2011?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 19                                                                                                                  | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 19                                                                                                                       | A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 20                                                                                                                  | Q. Okay. And one of the things you will 10:14:30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 20                                                                                                                       | Q. 2010? 10:16:34                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 21                                                                                                                  | have to do for our madam court reporter, as you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 21                                                                                                                       | A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 22                                                                                                                  | know from talking to your counsel, is to give                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 22                                                                                                                       | Q. 2009?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 23                                                                                                                  | verbal responses to all of my questions so that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 23                                                                                                                       | A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 24                                                                                                                  | she can write down all of your answers in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 24                                                                                                                       | Q. 2008?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 25                                                                                                                  | addition to all of my questions. Unfortunately, 10:14:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 25                                                                                                                       | A. Also possible. 10:16:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                     | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                     | Page 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                          | Page 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1                                                                                                                   | she cannot write down nods of the head or body                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | l .                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1                                                                                                                        | Q. 2007?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4                                                                                                                   | movements. Is that fair?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2                                                                                                                        | Q. 2007?<br>A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3                                                                                                                   | movements. Is that fair?  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                     | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2<br>3<br>4                                                                                                              | <ul><li>A. Also possible.</li><li>Q. 2006?</li><li>A. Also possible.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3<br>4<br>5                                                                                                         | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5                                                                                                         | <ul> <li>A. Also possible.</li> <li>Q. 2006?</li> <li>A. Also possible.</li> <li>Q. 2005?</li> <li>10:16:51</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3<br>4<br>5<br>6                                                                                                    | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6                                                                                                    | <ul> <li>A. Also possible.</li> <li>Q. 2006?</li> <li>A. Also possible.</li> <li>Q. 2005?</li> <li>A. Also possible.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3<br>4<br>5<br>6<br>7                                                                                               | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard the question, you have understood the question, and that you are testifying truthfully. Is that                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7                                                                                               | <ul> <li>A. Also possible.</li> <li>Q. 2006?</li> <li>A. Also possible.</li> <li>Q. 2005?</li> <li>A. Also possible.</li> <li>Q. 2004?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                              |
| 3<br>4<br>5<br>6<br>7<br>8                                                                                          | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard the question, you have understood the question, and that you are testifying truthfully. Is that fair?                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>A. Also possible.</li> <li>Q. 2006?</li> <li>A. Also possible.</li> <li>Q. 2005?</li> <li>A. Also possible.</li> <li>Q. 2004?</li> <li>A. Also possible.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>A. Also possible.</li> <li>Q. 2006?</li> <li>A. Also possible.</li> <li>Q. 2005?</li> <li>A. Also possible.</li> <li>Q. 2004?</li> <li>A. Also possible.</li> <li>Q. 2003?</li> </ul>                                                                                                                                                                                                                                                                                                                                                 |
| 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 10:17:03                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2003? A. Also possible. Q. 2002?                                                                                                                                                                                                                                                                                                                                                                              |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible.                                                                                                                                                                                                                                                                                                                                                                                       |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2002? A. Also possible. Q. 2001?                                                                                                                                                                                                                                                                                                                                                   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2001? A. No.                                                                                                                                                                                                                                                                                                                                                                       |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.  Q. Is Mr. Gibson in the room today? 10:15:16                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | A. Also possible. Q. 2006? A. Also possible. Q. 2005?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.  Q. Is Mr. Gibson in the room today? 10:15:16  A. Yes.                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | A. Also possible. Q. 2006? A. Also possible. Q. 2005?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.  Q. Is Mr. Gibson in the room today? 10:15:16  A. Yes.  Q. Okay. He's the gentleman with the suit                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2001? A. No. Q. Okay. So it's your testimony today that 10:17:08 you met Mr. Gibson, David Gibson, at some point between 2002 and 2017; is that correct?                                                                                                                                                                                                |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.  Q. Is Mr. Gibson in the room today? 10:15:16  A. Yes.  Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2001? A. No. Q. Okay. So it's your testimony today that 10:17:08 you met Mr. Gibson, David Gibson, at some point between 2002 and 2017; is that correct? A. Between 2002 and 2018, I believe, based                                                                                                                                                     |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.  Q. Is Mr. Gibson in the room today? 10:15:16  A. Yes.  Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the end of the table; is that correct?                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2001? A. No. Q. Okay. So it's your testimony today that 10:17:08 you met Mr. Gibson, David Gibson, at some point between 2002 and 2017; is that correct? A. Between 2002 and 2018, I believe, based on the range you provided.                                                                                                                          |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | movements. Is that fair?  A. Yes. Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes. Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes. Q. Is Mr. Gibson in the room today? 10:15:16 A. Yes. Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the end of the table; is that correct?  A. Yes. 10:15:31                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2001? A. No. Q. Okay. So it's your testimony today that 10:17:08 you met Mr. Gibson, David Gibson, at some point between 2002 and 2017; is that correct? A. Between 2002 and 2018, I believe, based on the range you provided. Q. Okay. So it's your testimony today that 10:17:27                                                                      |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | movements. Is that fair?  A. Yes.  Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes.  Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes.  Q. Is Mr. Gibson in the room today? 10:15:16  A. Yes.  Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the end of the table; is that correct?  A. Yes. 10:15:31                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A. Also possible. Q. 2006? A. Also possible. Q. 2005?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | movements. Is that fair?  A. Yes. Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes. Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes. Q. Is Mr. Gibson in the room today? 10:15:16 A. Yes. Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the end of the table; is that correct?  A. Yes. 10:15:31 Q. Can you estimate for me when you first                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A. Also possible. Q. 2006? A. Also possible. Q. 2005? A. Also possible. Q. 2004? A. Also possible. Q. 2003? A. Also possible. Q. 2003? A. Also possible. Q. 2002? A. Also possible. Q. 2001? A. No. Q. Okay. So it's your testimony today that 10:17:08 you met Mr. Gibson, David Gibson, at some point between 2002 and 2017; is that correct? A. Between 2002 and 2018, I believe, based on the range you provided. Q. Okay. So it's your testimony today that 10:17:27 you first met David Gibson somewhere between 2002 and 2018, correct? |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | movements. Is that fair?  A. Yes. Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes. Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes. Q. Is Mr. Gibson in the room today? 10:15:16  A. Yes. Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the end of the table; is that correct?  A. Yes. 10:15:31 Q. Can you estimate for me when you first met Mr. Gibson?       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A. Also possible. Q. 2006? A. Also possible. Q. 2005?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | movements. Is that fair?  A. Yes. Q. So if I ask you a question and you answer it, we will all assume that you have heard 10:14:56 the question, you have understood the question, and that you are testifying truthfully. Is that fair?  A. Yes. Q. Okay. Great. Thank you. So you said 10:15:06 that you have met Mr. Gibson before but you don't remember when you met him for the first time; is that correct?  A. Yes. Q. Is Mr. Gibson in the room today? 10:15:16 A. Yes. Q. Okay. He's the gentleman with the suit and the white shirt without a tie sitting at the end of the table; is that correct?  A. Yes. 10:15:31 Q. Can you estimate for me when you first met Mr. Gibson? A. No. | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A. Also possible. Q. 2006? A. Also possible. Q. 2005?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Page 10 A. Yes.                                    | _                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Page 12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A. Yes.                                            | ۱ .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                    | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Q. Can you describe for me the                     | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MR. KESLAR: That's our position, yes,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| circumstances under which you first met David      | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | that there's a First Amendment privilege for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Gibson?                                            | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| MR. KESLAR: Objection. He's here today 10:17:42    | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MR. HOLMAN: Yeah, I don't think that's 10:19:37                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| as a newspaper reporter and that would - because   | 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | right. So you're instructing him not to answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| that did not was not printed in the news           | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| articles that is subject to this case, it's        | 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MR, KESLAR: Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| privileged information.                            | 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | MR. HOLMAN: Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| MR. HOLMAN: The circumstances of him 10:18:00      | 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Q. On how many occasions have you talked to 10:19:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| meeting Mr. Gibson? Okay.                          | 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Mr. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Q. Did you first meet Mr. Gibson in                | 12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                    | 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Q. Do you have any idea on how many                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| A. I don't know.                                   | 14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | occasions you've talked to Mr. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Q. Okay. Is there anything that you could 10:18:13 | 15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | A. That appears to be the same question I 10:19:54                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                    | 16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | answered.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                    | 17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Q. Okay. You don't know?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Mr. Gibson?                                        | 18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| A. No.                                             | 19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Q. Okay. What did you do to prepare for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                    | 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | today's deposition? 10:20:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                    | t                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | A. Spoke with my attorney.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. And who is your attorney?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                    | í                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | A. Steve.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                    | )                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. Steve who?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                    | )                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | A. Keslar. 10:20:08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| (***)**********************************            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Page 11                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Page 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| identify a source. I'm just asking what his        | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. What else did you do to prepare                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                    | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | for your deposition today?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. A number of things.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. Such as?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | A. Spoke to my other attorney, John 10:20:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Bussian.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. What else did you do to prepare                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | for your deposition today?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| •                                                  | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| •                                                  | I -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | A. Briefly looked at some news articles.  O. Which news articles? 10:20:31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                    | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | · ·                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                    | I '                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | A. One article that was published online                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | and another article that was published in print.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| · · · · · · · · · · · · · · · · · · ·              | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Did you look at any other articles?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| ŕ                                                  | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | A. In preparation for today's deposition?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Correct. 10:20:45                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                    | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. What else did you do to prepare                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| • •                                                | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | for today's deposition?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. Could you be more specific?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| • • •                                              | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Sure, You've talked about how you 10:20:53                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | reviewed two articles, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| it.                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                    | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Q. Okay. You also talked about how you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| - ·                                                | 24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | talked to your two lawyers, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1 1 /                                              | 25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | A. Yes. 10:21:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Molnar Reporting Services, LLC (440) 340-6161      | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                    | as a newspaper reporter and that would — because that did not — was not printed in the news articles that is subject to this case, it's privileged information.  MR. HOLMAN: The circumstances of him 10:18:00 meeting Mr. Gibson? Okay.  Q. Did you first meet Mr. Gibson in connection with a news story?  A. I don't know.  Q. Okay. Is there anything that you could 10:18:13 look at that would refresh your recollection about the circumstances under which you first met Mr. Gibson?  A. No.  Q. Have you exchanged any e-mails with 10:18:25 Mr. Gibson?  MR. KESLAR: Objection. That's privileged information. It's unpublished in the news articles.  MR. HOLMAN: Well, I'm not trying to 10:18:35 Molnar Reporting Services, LLC (440) 340-6161  Page 11 identify a source. I'm just asking what his personal knowledge is.  MR. KESLAR: Whether he received information or not, if he did, then it would be privileged because it was not disclosed in the news articles.  MR. HOLMAN: So you're saying if it's disclosed in the news articles, I can't ask about any contact —  MR. KESLAR: Undisclosed.  MR. KESLAR: Yeah.  MR. HOLMAN: So if it's not disclosed, so if a conversation is not disclosed, then I can't ask him about it?  MR. KESLAR: If it's disclosed in the two newspaper articles that — I guess that this 10:19:16 deposition concerns, then yeah, you can ask about | as a newspaper reporter and that would – because that did not – was not printed in the news articles that is subject to this case, it's privileged information.  MR. HOLMAN: The circumstances of him 10:18:00 meeting Mr. Gibson? Okay.  Q. Did you first meet Mr. Gibson in connection with a news story?  A. I don't know.  Q. Okay. Is there anything that you could 10:18:13 15 look at that would refresh your recollection about the circumstances under which you first met Mr. Gibson?  A. No.  Q. Have you exchanged any e-mails with 10:18:25 20 Mr. Gibson?  MR. KESLAR: Objection. That's 22 privileged information. It's unpublished in the news articles.  MR. HOLMAN: Well, I'm not trying to 10:18:35 Molnar Reporting Services, LLC (440) 340-6161 25 MR. KESLAR: Whether he received information or not, if he did, then it would be privileged because it was not disclosed in the 10:18:45 news articles.  MR. HOLMAN: So you're saying if it's disclosed in the news articles, I can't ask about any contact—  MR. KESLAR: Undisclosed.  MR. HOLMAN: So if it's not disclosed, 10:18:59 MR. KESLAR: Yeah.  MR. KESLAR: That's our position, yes.  MR. KESLAR: That's our position, yes.  MR. KESLAR: If it's disclosed in the 10:19:10 mewspaper articles that – I guess that this 10:19:16 deposition concerns, then yeah, you can ask about it.  MR. KESLAR: Bit's disclosed in the 10:19:16 deposition concerns, then yeah, you can ask about it.  MR. HOLMAN: But if it's not disclosed in the 10:19:16 deposition concerns, then yeah, you can ask about it. |

|    | Page 14                                                                                                    |    | Page 16                                                                                        |
|----|------------------------------------------------------------------------------------------------------------|----|------------------------------------------------------------------------------------------------|
| 1  | Q. So other than talking to your two                                                                       | 1  | MR. KESLAR: I'm instructing you not to                                                         |
| 2  | lawyers and other than reviewing the two                                                                   | 2  | answer,                                                                                        |
| 3  | articles, what else have you done to prepare for                                                           | 3  | Q. Have you received any e-mails from Terry                                                    |
| 4  | today's deposition?                                                                                        | 4  | Moore regarding Gibson's Bakery?                                                               |
| 5  | A. Brushed my teeth, 10:21:14                                                                              | 5  | MR. KESLAR: Same objection, and I'm 10:24:13                                                   |
| 6  | Q. Okay. Good. That's good. I'm happy                                                                      | 6  | going to instruct you not to answer.                                                           |
| 7  | you did that. Did you do anything else to                                                                  | 7  | Q. Have you received any e-mails from                                                          |
| 8  | prepare for today's deposition?                                                                            | 8  | Matthew Onest regarding Gibson's Bakery?                                                       |
| 9  | A. Could you be more specific?                                                                             | 9  | MR, KESLAR: Same objection, and I'm                                                            |
| 10 | Q. Sure. So other than brushing your teeth 10:21:25                                                        | 10 | going to instruct you not to answer. 10:24:27                                                  |
|    |                                                                                                            | 11 |                                                                                                |
| 11 | and other than reviewing two articles and other                                                            | 12 | Q. Have you received any e-mails from Lee                                                      |
| 12 | than talking to your two lawyers, did you do                                                               | 1  | Plakas regarding Gibson's Bakery?                                                              |
| 13 | anything else in order to appear today and give                                                            | 13 | MR. KESLAR: Same objection.                                                                    |
| 14 | testimony in connection with the Gibson Brothers                                                           | 14 | I'm going to instruct you not to answer.                                                       |
| 15 | case? 10:21:42                                                                                             | 15 | Q. Have you received any e-mails from 10:24:38                                                 |
| 16 | A. Again, could you be more specific?                                                                      | 16 | Brandon McHugh regarding Gibson's Bakery?                                                      |
| 17 | Q. Sure. Did you talk to anyone regarding                                                                  | 17 | MR. KESLAR: Same objection.                                                                    |
| 18 | your deposition today other than your two                                                                  | 18 | I'm going to instruct you not to answer.                                                       |
| 19 | lawyers?                                                                                                   | 19 | Q. Have you received any e-mails from James                                                    |
| 20 | A. I mentioned to several people that it 10:21:50                                                          | 20 | Taylor regarding Gibson's Bakery? 10:24:48                                                     |
| 21 | was happening, yes.                                                                                        | 21 | MR. KESLAR: Same objection.                                                                    |
| 22 | Q. Okay. And who did you                                                                                   | 22 | I'm going to instruct you not to answer.                                                       |
| 23 | A. But that was not preparatory.                                                                           | 23 | Q. Okay. You mentioned earlier that you                                                        |
| 24 | Q. Okay. And who did you mention that to?                                                                  | 24 | reviewed two newspaper articles in preparation                                                 |
| 25 | A. My wife. 10:22:01                                                                                       | 25 | for today's deposition, correct? 10:25:03                                                      |
|    | Molnar Reporting Services, LLC (440) 340-6161                                                              |    | Molnar Reporting Services, LLC (440) 340-6161                                                  |
|    | Page 15                                                                                                    |    | Page 17                                                                                        |
| 1  | Q. Okay. And what's her name?                                                                              | 1  | A. No.                                                                                         |
| 2  | A. Lisa Hawk.                                                                                              | 2  | Q. Okay. So what was your testimony?                                                           |
| 3  | Q. Okay. Who else did you talk to?                                                                         | 3  | A. I said that I reviewed one news article                                                     |
| 4  | A. In preparation for the deposition?                                                                      | 4  | and another news article. One was published                                                    |
| 5  | Q. Yes. 10:22:10                                                                                           | 5  | online. One was published in print. They were 10:25:16                                         |
| 6  | A. No one.                                                                                                 | 6  | not both newspaper articles.                                                                   |
| 7  | Q. No one. Okay. Did you review any                                                                        | 7  | Q. Okay. But you referred to the second                                                        |
| В  | you understand what the word preparation means,                                                            | 8  | one as a news article that appeared online?                                                    |
| 9  | correct?                                                                                                   | 9  | A. I referred to the first one as a news                                                       |
| 10 | A. Well, I think that mentioning that it 10:22:18                                                          | 10 | article that appeared online. 10:25:20                                                         |
| 11 | was happening today and preparing for it are two                                                           | 11 | Q. Okay. So the first one was a news                                                           |
| 12 | different things.                                                                                          | 12 | article. What was the date of that news article?                                               |
| 13 | Q. Okay. So my question is, other than                                                                     | 13 | A. Without looking, I wouldn't be able to                                                      |
| 14 | brushing your teeth and other than talking to                                                              | 14 | recall.                                                                                        |
| 15 | your two lawyers and other than reviewing two 10:22:30                                                     | 15 | Q. Okay. Who was the author of that news 10:25:31                                              |
| 16 | newspaper articles, did you do anything else to                                                            | 16 | article?                                                                                       |
| 17 | prepare to give testimony in this case today?                                                              | 17 | A. I was.                                                                                      |
| 18 | A. Nothing stands out in my mind.                                                                          | 18 | Q. Okay. Do you know about when it was                                                         |
| 19 | Q. Okay. Have you received any e-mails                                                                     | 19 | published?                                                                                     |
| 20 | from Owen Rarric regarding Gibson's Bakery? 10:23:45                                                       | 20 | A. In November 2016. 10:25:38                                                                  |
| 21 | MR. KESLAR: Objection. That would go                                                                       | 21 | Q. Okay. And so we're clear, how do you                                                        |
| 22 |                                                                                                            | 22 | refer to the second document that you looked at?                                               |
|    | to the potentially, it goes to the editorial                                                               | 23 |                                                                                                |
|    | process, which is privileged under the First                                                               |    | A. It's a second news article, a follow-up, that was published in print.                       |
| 23 | A                                                                                                          |    | IDOLUME DIDENAGIO DE BEIRE                                                                     |
| 24 | Amendment to the U.S. Constitution.                                                                        | 24 |                                                                                                |
|    | Amendment to the U.S. Constitution. Q. Okay. You can answer. Molnar Reporting Services, LLC (440) 340-6161 | 25 | Q. So would you agree with me that the 10:25:55  Molnar Reporting Services, LLC (440) 340-6161 |

|          | Page 18                                                                  |     |                                                                        |
|----------|--------------------------------------------------------------------------|-----|------------------------------------------------------------------------|
| -        |                                                                          | 1   |                                                                        |
| 1        | first article that appeared was a news article?                          | 1   | article, correct?                                                      |
| 2        | A. Yes.                                                                  | 2   | A. Yes.                                                                |
| 3        | Q. Would you agree with me that the second                               | 4   | Q. Okay. What was the date of the                                      |
| 4        | article that was published online was also a news article? 10:26:11      | 5   | follow-up news article?  A. I don't recall the specific date. 10:28:12 |
| 5        | A. Yes.                                                                  | 6   |                                                                        |
| 6<br>7   | · · · · · · · · · · · · · · · · · · ·                                    | 7   | Q. Okay. Have you ever received an e-mail                              |
|          | Q. Okay. It was a follow-up news article, correct?                       | 8   | from the law firm of Krugliak, Wilkins, Griffiths                      |
| 8        | A. Yes.                                                                  | 9   | & Dougherty, Co., L.P.A.?                                              |
| 9        |                                                                          | 10  | MR. KESLAR: Objection. First Amendment privilege. 10:29:05             |
| 10       | Q. What do you mean by "follow-up news 10:26:18 article"?                | 11  | F                                                                      |
| 11       | MR. KESLAR: Objection. Gets to that                                      | 12  | You don't have to respond.  Q. Have you ever received an e-mail from   |
| 12<br>13 |                                                                          | 13  |                                                                        |
|          | editorial process, which is privileged information.                      | 14  | Tzangas Plakas Mannos, Ltd.? MR. KESLAR: Same objection.               |
| 14<br>15 | MR. HOLMAN: Well, the witness described 10:26:29                         | 15  | You don't have to answer. 10:29:17                                     |
| 16       | it as a follow-up news article. I think it's                             | 16  | Q. Have you ever received an e-mail from                               |
| 17       | fair to me for me to ask what do you mean by a                           | 17  | James N. Taylor, Co., L.P.A.?                                          |
| 18       | follow-up news article. I don't think it gets to                         | 18  | MR. KESLAR: Same objection.                                            |
|          |                                                                          | 19  | You don't have to answer.                                              |
| 19<br>20 | any editorial process.  MR, KESLAR: To the extent that it calls 10:26:40 | 20  | Q. Have you received any written 10:29:25                              |
| 21       | for him to characterize the intent of the second                         | 21  | communication or document of any kind from                             |
| 22       | article, it does get to the editorial process,                           | 22  | Krugliak, Wilkins, Griffiths & Dougherty, Co.,                         |
| 23       | which is privileged information.                                         | 23  | L.P.A.?                                                                |
| 24       | Q. Why did you use the phrase "follow-up                                 | 24  | MR. KESLAR: Same objection.                                            |
| 25       | news article"? 10:26:52                                                  | 25  | You don't have to answer. 10:29:36                                     |
| 23       | Molnar Reporting Services, LLC (440) 340-6161                            | 23  | Molnar Reporting Services, LLC (440) 340-6161                          |
|          | Within Reporting Services, Like (140) 340-0101                           |     | Wollar Reporting Services, LDC (440) 340-0101                          |
|          | Page 19                                                                  |     | Page 21                                                                |
| 1        | A. It was a separate article.                                            | 1   | Q. Have you ever received any written                                  |
| 2        | Q. So a follow-up article is a separate                                  | 2   | communication or document from Tzangas Plakas                          |
| 3        | article?                                                                 | 3   | Mannos, LTD?                                                           |
| 4        | A. Yes.                                                                  | 4   | MR. KESLAR: Same objection.                                            |
| 5        | Q. Why did you use the phrase "follow-up" 10:27:06                       | 5   | You don't have to answer. 10:29:47                                     |
| 6        | in connection with that second news article?                             | 6   | Q. Have you ever received any written                                  |
| 7        | A. It was a second news article.                                         | 7   | communication or document from the firm of James                       |
| 8        | <ul> <li>Q. Okay. Are you saying it was a second</li> </ul>              | 8   | N. Taylor Co., L.P.A.?                                                 |
| 9        | news article that followed the first news                                | 9   | MR. KESLAR: Same objection.                                            |
| 10       | article? 10:27:25                                                        | 10  | You don't have to answer. 10:29:57                                     |
| 11       | A. Chronologically, yes.                                                 | 11  | <ul> <li>Q. Have you received or seen any written</li> </ul>           |
| 12       | Q. Okay. And because of that chronological                               | 12  | communication or document from Owen Rarric?                            |
| 13       | relationship, you're referring to the second news                        | 13  | MR. KESLAR: Objection. First Amendment                                 |
| 14       | article as a follow-up news article?                                     | 1.4 | privilege.                                                             |
| 15       | A. Yes. 10:27:36                                                         | 15  | You don't have to answer that. 10:31:50                                |
| 16       | <ul> <li>Q. Okay. Is there any other reason why you</li> </ul>           | 16  | MR. HOLMAN: Okay. Now, getting to your                                 |
| 17       | referred to the second news article as a                                 | 1.7 | objection, Counselor, Owen Rarric is quoted in a                       |
| 18       | follow-up news article?                                                  | 18  | newspaper article here.                                                |
| 19       | MR. KESLAR: Objection. First Amendment                                   | 19  | MR. KESLAR: Okay. Do you have the                                      |
| 20       | privilege. Goes to the editorial process. 10:27:47                       | 20  | specific article? 10:32:04                                             |
| 21       | You don't have to answer.                                                | 21  | MR. HOLMAN: Yeah, I do.                                                |
| 22       | Q. Who wrote the follow-up news article?                                 | 22  | MR. KESLAR: So I know what you're                                      |
| 23       | A. I did.                                                                | 23  | talking about?                                                         |
| 24       | <ul> <li>Q. Okay. So you authored both the first</li> </ul>              | 24  | MR. HOLMAN: Sure. I'll show it to you.                                 |
| 25       | news article and the second follow-up news 10:28:01                      | 25  | If you look at page 2 – let's go off the record 10:32:05               |
|          | Molnar Reporting Services, LLC (440) 340-6161                            |     | Molnar Reporting Services, LLC (440) 340-6161                          |
|          | Molnar Reporting Services, LLC (440) 340-6161                            |     | Molnar Reporting Services, LLC (440) 340-6161                          |

|                                                                                                            | Page 22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                 | Page 24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                          | for a second, please.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                                                                                                               | Q. Okay. Thank you. On approximately how                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2                                                                                                          | VIDEOGRAPHER: Off the record, 10:31.                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2                                                                                                               | many occasions have you walked inside Gibson's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3                                                                                                          | (Discussion off record.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 3                                                                                                               | Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4                                                                                                          | VIDEOGRAPHER: On the record, 10:41.                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 4                                                                                                               | A. I can't estimate that for you,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5                                                                                                          | MR. HOLMAN: So before we continue with 10:41:54                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                               | Q. Okay. Have you been there approximately 10:44:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6                                                                                                          | the examination, I just want to make clear, and                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 6                                                                                                               | 100 times?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 7                                                                                                          | I'm sure you know this already, but we have asked                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 7                                                                                                               | A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 8                                                                                                          | Mr. Hawk to appear here and to give testimony                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 8                                                                                                               | Q. Okay. What about this: Have you been                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9                                                                                                          | because he is a reporter, but also because he is                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9                                                                                                               | there approximately 1,000 times?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10                                                                                                         | a fact witness. He has, in fact, been identified 10:42:12                                                                                                                                                                                                                                                                                                                                                                                                                                         | 10                                                                                                              | A. Fewer than that. 10:44:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 11                                                                                                         | as a fact witness by the plaintiffs in this case.                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 11                                                                                                              | Q. Okay. 500 times?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12                                                                                                         | And so the line of questioning that I'm exploring                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 12                                                                                                              | A. Probably fewer than that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 13                                                                                                         | this morning relates to matters that relate to                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 13                                                                                                              | Q. Okay. 250 times?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 14                                                                                                         | his his work as a reporter, but also, again,                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 14                                                                                                              | A. Probably fewer than that as well.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 15                                                                                                         | as a fact witness. 10:42:31                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 15                                                                                                              | Q. Okay. What about 100 times? 10:45:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 16                                                                                                         | MR. KESLAR: I understand that, I think                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 16                                                                                                              | A. Probably fewer than that as well.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 17                                                                                                         | that the two, it's a distinction without meaning,                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 17                                                                                                              | Q. Okay. What about 50 times?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 18                                                                                                         | especially in this case, because all of his                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 18                                                                                                              | A. I really don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 19                                                                                                         | conduct was in both his capacity as a reporter                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 19                                                                                                              | Q. Okay. So your best testimony today is                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 20                                                                                                         | and as an editor, and so he can't waive that 10:42:46                                                                                                                                                                                                                                                                                                                                                                                                                                             | 20                                                                                                              | that you have walked inside Gibson's Bakery fewer 10:45:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 21                                                                                                              | than 150 times?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 21<br>22                                                                                                   | privilege he can't speak about it as a fact                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 22                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                            | witness without also waiving the privileges                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1                                                                                                               | A. That seems reasonable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 23                                                                                                         | afforded to him by the First Amendment of the                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 23                                                                                                              | Q. Okay. Have you purchased merchandise at                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 24                                                                                                         | U.S. Constitution, so I'm just going to have to                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 25                                                                                                              | Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 25                                                                                                         | keep enforcing those privileges to maintain them. 10:42:59                                                                                                                                                                                                                                                                                                                                                                                                                                        | 23                                                                                                              | A. Yes. 10:45:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                 | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                            | Page 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                 | Page 25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1                                                                                                          | Q. Have you ever walked inside Gibson's                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 1                                                                                                               | Q. What types of merchandise have you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2                                                                                                          | Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2                                                                                                               | purchased at the bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3                                                                                                          | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 3                                                                                                               | A. Soda, chocolate, pastries, I believe.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4                                                                                                          | Q. Okay. When was the first time that you                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                            | Q. Okny. When was the hist time dist you                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 4                                                                                                               | Q. Does that include donuts?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 4<br>5                                                                                                          | •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5<br>6                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1                                                                                                               | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                            | walked inside Gibson's Bakery? 10:43:11  A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                       | 5                                                                                                               | A. I'm a fat man, sir. It's probably going 10:46:05                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6                                                                                                          | walked inside Gibson's Bakery? 10:43:11  A. I don't recall.  Q. Okay. Was it in 2018?                                                                                                                                                                                                                                                                                                                                                                                                             | 5<br>6                                                                                                          | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6<br>7                                                                                                     | walked inside Gibson's Bakery? 10:43:11 A. I don't recall. Q. Okay. Was it in 2018? A. No.                                                                                                                                                                                                                                                                                                                                                                                                        | 5<br>6<br>7                                                                                                     | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 6<br>7<br>8                                                                                                | walked inside Gibson's Bakery? 10:43:11 A. I don't recall. Q. Okay. Was it in 2018? A. No. Q. 2017?                                                                                                                                                                                                                                                                                                                                                                                               | 5<br>6<br>7<br>8                                                                                                | <ul> <li>A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.</li> <li>Q. How are the donuts?</li> <li>A. I – I like donuts.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6<br>7<br>8<br>9                                                                                           | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018? A. No. Q. 2017? A. No. 10:43:25                                                                                                                                                                                                                                                                                                                                                                              | 5<br>6<br>7<br>8<br>9                                                                                           | <ul> <li>A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.</li> <li>Q. How are the donuts?</li> <li>A. I – I like donuts.</li> <li>Q. Okay. So do I.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6<br>7<br>8<br>9<br>10                                                                                     | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016?                                                                                                                                                                                                                                                                                                                                                                    | 5<br>6<br>7<br>8<br>9                                                                                           | <ul> <li>A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.</li> <li>Q. How are the donuts?</li> <li>A. I – I like donuts.</li> <li>Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |
| 6<br>7<br>8<br>9<br>10<br>11                                                                               | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No.                                                                                                                                                                                                                                                                                                                                                             | 5<br>6<br>7<br>8<br>9<br>10                                                                                     | <ul> <li>A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.</li> <li>Q. How are the donuts?</li> <li>A. I – I like donuts.</li> <li>Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.</li> <li>Q. So other than soda, chocolate, and</li> </ul>                                                                                                                                                                                                                                                                                                                                  |
| 6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015?                                                                                                                                                                                                                                                                                                                                                    | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | <ul> <li>A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.</li> <li>Q. How are the donuts?</li> <li>A. I – I like donuts.</li> <li>Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.</li> <li>Q. So other than soda, chocolate, and pastries, including donuts, can you identify any</li> </ul>                                                                                                                                                                                                                                                                                 |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015? A. Probably not.                                                                                                                                                                                                                                                                                                                                   | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | <ul> <li>A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.</li> <li>Q. How are the donuts?</li> <li>A. I – I like donuts.</li> <li>Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.</li> <li>Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's</li> </ul>                                                                                                                                                                                                                                 |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? 10:43:41                                                                                                                                                                                                                                                                                                           | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts.  Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.  Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32                                                                                                                                                                                                                                                                    |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? 10:43:41 A. I don't know.                                                                                                                                                                                                                                                                                          | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts.  Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.  Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery?  10:46:32  A. I believe I've purchased magazines and                                                                                                                                                                                                                        |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? 10:43:41 A. I don't know. Q. 2013?                                                                                                                                                                                                                                                                                 | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts.  Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.  Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32  A. I believe I've purchased magazines and newspapers there as well.                                                                                                                                                                                               |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? 10:43:41 A. I don't know. Q. 2013? A. Sir, I worked a large number of years in                                                                                                                                                                                                                                     | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts.  Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest.  Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32  A. I believe I've purchased magazines and newspapers there as well.  Q. Anything else?                                                                                                                                                                            |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | walked inside Gibson's Bakery? 10:43:11  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. 10:43:25 Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? 10:43:41 A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's                                                                                                                                                                                      | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32  A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter.                                                                                                                                    |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | walked inside Gibson's Bakery?  A. I don't recall. Q. Okay. Was it in 2018? A. No. Q. 2017? A. No. Q. 2016? A. No. Q. 2015? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's Bakery. I don't know when the first time was.  10:44:05                                                                                                                                          | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts? A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32 A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter. Q. Have you shopped at Gibson's Bakery this 10:46:57                                                                                 |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | walked inside Gibson's Bakery?  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's Bakery. I don't know when the first time was. It could be anytime dating back to 2002.                                                                                                                          | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32  A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter. Q. Have you shopped at Gibson's Bakery this month, meaning June 2018?                                                              |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | walked inside Gibson's Bakery?  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's Bakery. I don't know when the first time was. It could be anytime dating back to 2002. Q. Okay. So it's your testimony that you                                                                                 | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32  A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter. Q. Have you shopped at Gibson's Bakery this 10:46:57 month, meaning June 2018? A. No.                                              |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | walked inside Gibson's Bakery?  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's Bakery. I don't know when the first time was. It could be anytime dating back to 2002. Q. Okay. So it's your testimony that you may have first walked into Gibson's Bakery                                      | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts? A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32 A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter. Q. Have you shopped at Gibson's Bakery this month, meaning June 2018? A. No. Q. Okay. May 2018?                                      |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | walked inside Gibson's Bakery?  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's Bakery. I don't know when the first time was. It could be anytime dating back to 2002. Q. Okay. So it's your testimony that you may have first walked into Gibson's Bakery sometime between 2002 and what year? | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts?  A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32  A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter. Q. Have you shopped at Gibson's Bakery this month, meaning June 2018? A. No. Q. Okay. May 2018? A. To save us all time, is it your |
| 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | walked inside Gibson's Bakery?  A. I don't recall. Q. Okay. Was it in 2018?  A. No. Q. 2017? A. No. Q. 2016? A. No. Q. 2015? A. Probably not. Q. Okay. 2014? A. I don't know. Q. 2013? A. Sir, I worked a large number of years in Oberlin about a block and a half from Gibson's Bakery. I don't know when the first time was. It could be anytime dating back to 2002. Q. Okay. So it's your testimony that you may have first walked into Gibson's Bakery                                      | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. I'm a fat man, sir. It's probably going 10:46:05 to include donuts.  Q. How are the donuts? A. I – I like donuts. Q. Okay. So do I.  MS. CROCKER: Who doesn't? Let's be 10:46:19 honest. Q. So other than soda, chocolate, and pastries, including donuts, can you identify any other goods that you've purchased from Gibson's Bakery? 10:46:32 A. I believe I've purchased magazines and newspapers there as well. Q. Anything else? A. Assorted sweets from under the counter. Q. Have you shopped at Gibson's Bakery this month, meaning June 2018? A. No. Q. Okay. May 2018?                                      |

|                                                                                                                          | Page 26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                          | Page 28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                        | month by month?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                                                        | Q. Okay. That's actually Allyn D.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2                                                                                                                        | Q. I'm not sure what my intention is.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2                                                                                                                        | A. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3                                                                                                                        | Have you shopped at Gibson's Bakery in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3                                                                                                                        | Q. So Allyn D., I'll represent to you,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4                                                                                                                        | May 2018?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 4                                                                                                                        | unless Mr. Gibson corrects me, Allyn Allyn D.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 5                                                                                                                        | A. No. 10:47:33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 5                                                                                                                        | Gibson is the son of David Gibson, so my question 10:49:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 6                                                                                                                        | Q. April 2018?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6                                                                                                                        | relates to Allyn W. Gibson.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7                                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 7                                                                                                                        | Do you know who that is?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8                                                                                                                        | Q. March 2018?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 8 9                                                                                                                      | A. I wouldn't be able to pick him out of a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 9<br>10                                                                                                                  | A. No. Q. February 2018? 10:47:37                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 10                                                                                                                       | lineup, no. Q. Okay. I'll represent to you, and 10:50:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11                                                                                                                       | Q. February 2018? 10:47:37 A. I don't believe so. I can say with                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 11                                                                                                                       | Mr. Gibson can certainly correct me, but I                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12                                                                                                                       | certainty the months that you've already listed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 12                                                                                                                       | believe that Allyn W. Gibson is the father of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 13                                                                                                                       | Beyond that, I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 13                                                                                                                       | David Gibson.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 14                                                                                                                       | Q. What about January 2018?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 14                                                                                                                       | Have you ever seen Allyn W. Gibson                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 15                                                                                                                       | A. It's beyond that. 10:47:57                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 15                                                                                                                       | inside the bakery? 10:50:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 16                                                                                                                       | Q. Okay. Have you stopped shopping at                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 16                                                                                                                       | A. Not – not for sure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 17                                                                                                                       | Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 17                                                                                                                       | Q. Okay. I'll also represent to you that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 18                                                                                                                       | A. Is your question that I've consciously                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 18                                                                                                                       | Allyn D. Gibson is the son of David Gibson and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 19                                                                                                                       | made a decision not to shop there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 19                                                                                                                       | the grandson of Allyn W. Gibson.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 20                                                                                                                       | Q. Yeah, I'll reask the question. Sure. 10:48:08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 20                                                                                                                       | Do you know who Allyn D. Gibson is? 10:50:32                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 21                                                                                                                       | Have you made a conscious decision to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 21                                                                                                                       | <ul> <li>A. Only insofar as you've described it.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 22                                                                                                                       | stop shopping at Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 22                                                                                                                       | Q. Okay. You don't recall ever seeing him                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 23                                                                                                                       | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 23                                                                                                                       | inside the bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 24                                                                                                                       | Q. Okay. Have you seen David Gibson inside                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 24                                                                                                                       | A. Not to my knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 25                                                                                                                       | Gibson's Bakery? 10:48:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 25                                                                                                                       | Q. Okay. And do you recall ever talking to 10:50:46                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1                                                                                                                        | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                          | • • • • • • • • •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                          | ( ,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                          | Page 27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u> </u>                                                                                                                 | Page 29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1                                                                                                                        | Page 27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1                                                                                                                        | Page 29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1<br>2                                                                                                                   | Page 27  A. Could - I mean, is your question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1 2                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                          | Page 27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1                                                                                                                        | Page 29 Allyn D. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2                                                                                                                        | Page 27  A. Could I mean, is your question specific to a time frame?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2                                                                                                                        | Page 29 Allyn D. Gibson? A. Not to my knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3                                                                                                                   | Page 27  A. Could – I mean, is your question specific to a time frame?  Q. No. And let's back up.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2 3                                                                                                                      | Page 29  Allyn D. Gibson?  A. Not to my knowledge.  Q. Okay. During your visits to Gibson's  Bakery, how have you been treated – or strike that.  10:51:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2<br>3<br>4                                                                                                              | Page 27  A. Could – I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of the table, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6                                                                                                    | Page 29  Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10  What are your impressions of Gibson's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                               | Page 27  A. Could – I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of the table, correct?  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7                                                                                               | Page 29  Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10  What are your impressions of Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of the table, correct?  A. Yes. Q. So my question is, during any of your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | Page 29  Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10  What are your impressions of Gibson's Bakery?  MR. KESLAR: Objection. The question as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | Page 29  Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10  What are your impressions of Gibson's Bakery?  MR. KESLAR: Objection. The question as phrased invades on the editorial process, which                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52  A. I can't recall a specific time that I                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated — or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. Constitution, and therefore, it's privileged                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  A. I can't recall a specific time that I would have.                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. Constitution, and therefore, it's privileged information to the extent that he's been – it                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's                                                                                                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | A. Could – I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  10:48:52  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated — or strike that. 10:51:10  What are your impressions of Gibson's Bakery?  MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. Constitution, and therefore, it's privileged information to the extent that he's been — it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in                                                                                                                                                                                                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | A. Could – I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10  What are your impressions of Gibson's Bakery?  MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery.                                                                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question.                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up, You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52 A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery? A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated — or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been — it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question. MR. HOLMAN: I disagree vehemently with                                                                                                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store?  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have you ever seen Mr. Gibson inside Gibson's Bakery?                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question. MR. HOLMAN: I disagree vehemently with your assertion of the privilege.                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have you ever seen Mr. Gibson inside Gibson's Bakery?  A. I don't know. 10:49:17                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question. MR. HOLMAN: I disagree vehemently with your assertion of the privilege. Q. So let's go back. So you've testified 10:51:43                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentlernan with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have you ever seen Mr. Gibson inside Gibson's Bakery?  A. I don't know. 10:49:17 Q. Okay. Have you ever talked to                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question. MR. HOLMAN: I disagree vehemently with your assertion of the privilege. Q. So let's go back. So you've testified 10:51:43 that you have actually walked inside Gibson's                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentlernan with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have you ever seen Mr. Gibson inside Gibson's Bakery?  A. I don't know. 10:49:17 Q. Okay. Have you ever talked to Mr. Gibson inside Gibson's Bakery?                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated — or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been — it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question. MR. HOLMAN: I disagree vehemently with your assertion of the privilege. Q. So let's go back. So you've testified 10:51:43 that you have actually walked inside Gibson's Bakery less than 150 times, correct?         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentleman with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have you ever seen Mr. Gibson inside Gibson's Bakery?  A. I don't know. 10:49:17 Q. Okay. Have you ever talked to Mr. Gibson inside Gibson's Bakery? A. Again, I don't know. | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated — or strike that. 10:51:10 What are your impressions of Gibson's Bakery? MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been — it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34 So I'm going to instruct you not to answer that question. MR. HOLMAN: I disagree vehemently with your assertion of the privilege. Q. So let's go back. So you've testified 10:51:43 that you have actually walked inside Gibson's Bakery less than 150 times, correct? A. Yes. |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A. Could — I mean, is your question specific to a time frame?  Q. No. And let's back up. You've identified Mr. Gibson as the gentlernan with the white coffee cup at the end of 10:48:42 the table, correct?  A. Yes. Q. So my question is, during any of your stops inside Gibson's Bakery, have you seen Mr. Gibson inside the store? 10:48:52  A. I can't recall a specific time that I would have. Q. Okay. So you have no recollection of ever seeing Mr. Gibson inside Gibson's Bakery?  A. I have no positive date that I can name 10:49:04 where I would have seen Mr. Gibson inside the bakery. Q. Setting aside the specific date, have you ever seen Mr. Gibson inside Gibson's Bakery?  A. I don't know. 10:49:17 Q. Okay. Have you ever talked to Mr. Gibson inside Gibson's Bakery?                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Allyn D. Gibson?  A. Not to my knowledge. Q. Okay. During your visits to Gibson's Bakery, how have you been treated – or strike that. 10:51:10  What are your impressions of Gibson's Bakery?  MR. KESLAR: Objection. The question as phrased invades on the editorial process, which is protected by the First Amendment of the U.S. 10:51:20 Constitution, and therefore, it's privileged information to the extent that he's been – it calls for his characterization of Gibson's Bakery, which, you know, as we're here about in this lawsuit and these articles. 10:51:34  So I'm going to instruct you not to answer that question.  MR. HOLMAN: I disagree vehemently with your assertion of the privilege. Q. So let's go back. So you've testified 10:51:43 that you have actually walked inside Gibson's Bakery less than 150 times, correct?     |

| Γ    | Page 30                                                    |        | Page 32                                                   |
|------|------------------------------------------------------------|--------|-----------------------------------------------------------|
| 1 1  |                                                            | 7      |                                                           |
| 1    | personal visits to Gibson's Bakery as a shopper?           | 1<br>2 | reporter and an editor. To the contrary, it               |
| 2    | A. They have nice food.                                    | 1      | relates solely to his shopping experience and his         |
| 3    | Q. Okay. Any other observations?                           | 3      | numerous shopping experiences at Gibson's Bakery.         |
| 4    | A. It appears to be well-kept.                             | 4      | So I'll restate the question.                             |
| 5    | Q. Any other observations? 10:52:33                        | 5      | Q. During the many times that you've 10:54:51             |
| 6    | A. Not particularly.                                       | 6      | shopped at Gibson's Bakery, have you seen the             |
| 7    | Q. Okay. Any observations on customer                      | 7      | staff at Gibson's Bakery treat anyone in a way            |
| 8    | service?                                                   | 8      | that you believed was unfair?                             |
| 9    | A. No.                                                     | 9      | A. No.                                                    |
| 10   | Q. Okay. Any observations on the 10:52:45                  | 10     | Q. During your many experiences as a 10:55:10             |
| 11   | friendliness or lack of friendliness of people             | 11     | shopper at Gibson's Bakery, did you see the staff         |
| 12   | working in the store?                                      | 12     | at Gibson's Bakery treat anyone in a way that you         |
| 13   | A. No.                                                     | 13     | thought was discriminatory in nature?                     |
| 14   | Q. Have you ever had any complaints about                  | 14     | A. No.                                                    |
| 15   | anything connected to Gibson's Bakery? 10:53:01            | 15     | Q. Did you – strike that. 10:55:25                        |
| 16   | A. Soda's price is a little bit high.                      | 16     | During the many times you have been to                    |
| 17   | Q. Okay. Any other complaints?                             | 17     | Gibson's Bakery, have you seen the staff at               |
| 18   | A. No.                                                     | 18     | Gibson's Bakery treat shoppers at the store               |
| 19   | Q. Okay. The prices have not deterred you                  | 19     | differently based upon race?                              |
| 20   | from shopping from time to time at Gibson's 10:53:22       | 20     | A. No. 10:55:41                                           |
| 21   | Bakery, correct?                                           | 21     | Q. Based upon skin color?                                 |
| 22   | A. I might buy soda somewhere else.                        | 22     | A. No.                                                    |
| 23   | Q. Do you believe that you have been                       | 23     | Q. Based upon age?                                        |
| 24   | treated fairly at Gibson's Bakery?                         | 24     | A. No.                                                    |
| 25   | A. Would you mind clarifying whether we're 10:53:36        | 25     | Q. Based upon whether they're a student or 10:55:49       |
|      | Molnar Reporting Services, LLC (440) 340-6161              |        | Molnar Reporting Services, LLC (440) 340-6161             |
|      | Page 31                                                    |        | Page 33                                                   |
| 1    | still talking about my interactions there as a             | 1      | faculty member or a member of the community?              |
| 2    | shopper?                                                   | 2      | A. I'm unaware of who was a student or                    |
| 3    | Q. Yes. So all of my questions right now                   | 3      | faculty member during my shopping experiences.            |
| 4    | relate to your contacts with Gibson's Bakery as a          | 4      | Q. Okay. So is it your testimony today                    |
| 5    | shopper. 10:53:49                                          | 5      | that, and again, we're looking at your less than 10:56:05 |
| 6    | A. I have no complaints.                                   | 6      | 150 experiences at Gibson's Bakery, have you ever         |
| 7    | Q. Correct. So let me rephrase the                         | 7      | seen the staff treat people differently?                  |
| 8    | question.                                                  | В      | A. No.                                                    |
| 9    | MR. HOLMAN: What was the question? Can                     | 9      | O. Okay. Does your wife – strike that.                    |
| 10   | you restate it, please? 10:54:03                           | 10     | Does Lisa shop at Gibson's Bakery? 10:56:26               |
| 11   | (Record read.)                                             | 11     | A. Again, you're assuming – I'm assuming                  |
| 12   | Q. So I'll repeat the question.                            | 12     | you're referring to my wife?                              |
| 13   | Do you believe that you've been treated                    | 13     | Q. Yes. Lisa Hawk, yeah.                                  |
| 14   | fairly as a shopper at Gibson's Bakery?                    | 14     | A. I don't know when my wife would shop at                |
| 15   | A. Yes. 10:54:08                                           | 15     | Gibson's Bakery. 10:56:42                                 |
| 16   | Q. Have you observed anything taking place                 | 16     | MR. HOLMAN: All right. Let's go off                       |
| 17   | at Gibson's Bakery to suggest that other shoppers          | 17     | the record for a second. Come on in.                      |
| 18   | were treated unfairly for any reason?                      | 18     | VIDEOGRAPHER: Off the record, 10:56.                      |
| 19   | MR. KESLAR: Objection. Because that                        | 19     | (Discussion off record.)                                  |
| 20   | goes to the reporter's privilege, First Amendment 10:54:21 | 20     | (Whereupon, Ms. Roman entered the                         |
| 21   | of the U.S. Constitution.                                  | 21     | conference room.)                                         |
| 22   | You don't have to answer that.                             | 22     | MR. HOLMAN: Let's go back on the                          |
| 23   | MR. HOLMAN: And again, I think the                         | 23     | record.                                                   |
| 24   | assertion of the privilege is misplaced. This              | 24     | VIDEOGRAPHER: On the record, 10:56.                       |
|      | has absolutely nothing to do with his duties as a 10:54:34 | 25     | (Record read.) 10:57:51                                   |
| L Z5 |                                                            |        | ,, 100/1001                                               |
| 25   | Molnar Reporting Services, LLC (440) 340-6161              |        | Molnar Reporting Services, LLC (440) 340-6161             |

| 1 Q. So my question is, has your wife, Lisa 2 Hawk, ever shopped at Gibson's Bakery? 3 A. Yes. 4 Q. Okay, Do you know for how long she has 5 shopped at Gibson's Bakery? 9 A. No. 1 Q. Do you know when she first started to 8 shop at Gibson's Bakery? 1 A. No. 2 2018? 1 Has she shopped at Gibson's Bakery in 1 Q. Okay, Do you know when she first started to 8 shop at Gibson's Bakery? 1 A. No. 2 2018? 1 Has she shopped at Gibson's Bakery in 1 Q. Okay. Do you know any knowledge as to 1 how many times she has shopped at Gibson's Bakery? 1 A. No. 1 Q. Has any on the way knowledge as to 1 Has she shopped at Gibson's Bakery? 1 A. No. 2 Has any one ever made any comments to you about Gibson's Bakery? 1 A. No. 3 you white she was she first started to 1 do not be shopped at Gibson's Bakery you have shopped at Gibson's Bakery? 1 A. No. 3 you white she was shopped at Gibson's Bakery you have shopped at Gibson's Bakery? 2 A. Yes. 3 you white she was shopped at Gibson's Bakery? 4 A. Yes. 4 Goday. What has she told you? 4 A. Than-end that. She does like their 4 A. Goday. What has she told you? 4 A. As gifts. 5 Q. Okay. What has she told you? 4 A. As gifts. 6 Q. Okay. So are you saying that you've 10:59:05 4 A. Yes. 6 Q. Okay. So are you saying that you've 10:59:05 5 partsites. 6 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastics for her as a gift? 4 A. Yes. 6 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastics for her as a gift? 6 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastics for her as a gift? 7 A. Yes. 8 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastics for her as a gift? 9 A. Yes. 9 Q. Okay. So or eyou saying that you've 10:59:05 1 Q. Okay. So or eyou saying that you've 10:59:17 1 A. Coorount haystacks. Coconnut whatever. 2 Q. Okay. So are you saying that you've 10:59:17 1 A. Coorount haystacks. Coconnut whatever. 2 Q. Okay. So are you saying that you've 10:59:17 1 A. Yes as dithat you shop at Gibson's Bakery? 9 A. She prefers eccount. 10:59:40 1 Q. Okay.  |     | Page 34                                         |     | Page 36                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-------------------------------------------------|-----|-----------------------------------------------------------------|
| Hawke, ever shopped at Gibson's Bakery?   2   2   3   4   4   4   5   5   5   5   5   5   5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1   |                                                 | 1   |                                                                 |
| 3 A. Yes. 4 Q. Okay. Do you know for how long she has shopped at Gibson's Bakery? 5 shopped at Gibson's Bakery? 6 A. No. 9 Do you know when she first started to shop at Gibson's Bakery? 9 A. No. 10 Q. Okay. Do you know when she first started to shop at Gibson's Bakery? 11 Has she shopped at Gibson's Bakery in 20187 12 20187 13 A. I don't know. 14 Q. Okay. Do you have any knowledge as to 15 how many times she has shopped at Gibson's 10.58.26 15 Bakery? 16 Bakery? 17 A. No. 19 Q. Have you had any discussions with her respirating Gibson's Bakery? 18 Q. Have you had any discussions with her respirating Gibson's Bakery? 19 A. Yes. 20 A. Yes. 21 Q. Okay. Must has she told you? 22 A. Yes. 23 Q. Okay. 24 A. I don't recall. 25 pastries. 26 pastries. 27 Page 35 28 Q. Okay. Good. 28 A. As gifts. 39 Q. As gifts. 30 Q. As gifts. 30 Q. As gifts. 30 Q. Okay. So are you saying that you've 10.59.05 30 Q. Okay. Which pastry does she like? 31 Q. Okay. Okon you can whalf? Coconut - 10.59.17 32 Q. Okay. Okon you can dead any comments that your wife has ever made about Gibson's Bakery? 39 A. Yes. 30 Q. Okay. Coconut whalf? Coconut - 10.59.17 31 Q. Okay. Oconut whalf? Coconut - 10.59.17 32 Q. Okay. Oconut whalf? Coconut - 10.59.17 33 Q. Okay. Oconut whalf? Coconut - 10.59.17 34 Q. Okay. Oconut whalf? Coconut - 10.59.17 35 Q. Okay. Oconut whalf? Coconut - 10.59.17 36 Q. Okay. Oconut whalf? Coconut - 10.59.17 31 Q. Okay. Oconut whalf? Coconut - 10.59.17 32 Q. Okay. Oconut whalf? Coconut - 10.59.17 33 Q. Okay. Oconut whalf? Coconut - 10.59.17 34 A. Coconut haystacks. Cacoonut whatever. 35 Q. Okay. Oconut whalf? Coconut - 10.59.17 36 Q. Okay. Oconut whalf? Coconut - 10.59.17 39 Q. Okay. Oconut whalf? Coconut - 10.59.17 40 Q. Okay. Oconut whalf? Coconut - 10.59.17 41 A. Coconut haystacks. Cacoonut whatever. 42 Q. Okay. Oconut whalf? Coconut - 10.59.17 43 A. I don't recall any psecific comments that your wife has ever made any comments that your wife has ever made any comments that your wife has ever made any comments that your wife has ev |     |                                                 | l   |                                                                 |
| 4 Q. Okay, Do you know when she first started to shoped at Gibson's Bakery?  5 A. No.  7 Q. Do you know when she first started to shop at Gibson's Bakery?  9 A. No.  9 Q. Day. Does she – strike that. 10:58:11 10 Has she shopped at Gibson's Bakery in 12 2018?  10 Q. Okay. Does she – strike that. 10:58:11 11 Has she shopped at Gibson's Bakery in 12 2018?  11 A. I don't know.  12 Q. Okay. Do you have any knowledge as to 15 bow many times she has shopped at Gibson's Bakery in 16 Bakery?  17 A. No.  18 Q. Have you had any discussions with her 18 Prepareding Gibson's Bakery?  19 A. Yes.  10 Q. Okay. What has she told you?  21 Q. Okay. What has she told you?  22 A. I don't recall.  23 Q. Okay. What has she told you?  24 A. Til anneal that. She does like their pastries. 10:58:59 Molnar Reporting Services, LLC (440) 340-6161  Page 35  1 Q. Okay. Good.  2 A. As gifts?  3 Q. Okay. Good.  4 A. As gifts.  9 Q. Okay. Good.  1 Q. Okay. Good.  2 A. As gifts?  4 A. As gifts.  9 Q. Okay. Good.  1 Q. Okay. Good.  2 A. As gifts.  9 Q. Okay. Good.  1 Q. Okay. Good.  2 A. As gifts.  9 Q. Okay. So are you saying that you've 10:59:05 purchased pastries for her as a gift?  4 A. As gifts.  9 Q. Okay. Coconut what? Coconut - 10:59:17 line. A. Coconut haystacks. Caconut whatever.  10 Q. Okay. Do you recall any vomments that your wife has ever made any comments that 10:59:17 line. A. Coconut haystacks. Caconut whatever.  10 Q. Okay. Do you recently any of the first strated to your your part wife has ever made any comments that your wife has ever made any comments that 10:59:17 line. A. Coconut haystacks. Caconut whatever.  10 Q |     |                                                 | ı   |                                                                 |
| 5 shopped at Gilsson's Bakery?  Q. Do you know when she first started to 8 shop at Gilsson's Bakery?  A. No.  Q. Okay. Does she – strike that.  10-58:11  Has she shopped at Gilsson's Bakery in 12 2018?  A. I don't know.  14 Q. Okay. Do you have any knowledge as to how many times she has shopped at Gilsson's Bakery in 12 2018?  15 how many times she has shopped at Gilsson's 10-58:26 la Bakery?  16 Bakery?  17 A. No.  Q. Okay. Do you have any knowledge as to how many times she has shopped at Gilsson's Bakery in 12 about Gilsson's Bakery?  18 Q. Have you had any discussions with her regarding Gilsson's Bakery?  19 A. Yes.  10 Q. Okay. What has she told you?  21 A. I don't recall.  22 A. I don't recall.  23 Q. Okay.  A. Til amend that. She does like their patries.  24 A. Til amend that. She does like their patries.  25 pastries.  Q. Okay. Okay. Okay.  A. As gifts.  Q. Okay. Okay. Osod.  A. As gifts.  Q. Okay. Oso you ashing that you've 10-59-05 purchased pastries for her as a gift?  A. Yes.  Q. Okay. Oso you ashing that you've 10-59-05 purchased pastries for her as a gift?  A. Yes.  Q. Okay. Osomunents that your wife hose ver made any comments that your wife has even made about Gilsson's Bakery?  10 Q. Okay. Osomun what? Coconut — 10-59-17 in Q. Okay. Osomun thaystucks. Coconut whatever.  Q. Okay. Osomun what? Coconut — 10-59-17 in Q. Okay. Osomun wife has ever made about Gilsson's Bakery?  A. I don't recall any thing positive or negative or otherwise. Is that own whome who Moinar Reporting Services, LLC (440) 340-6161  Page 35  10 Q. Okay. Osomun what? Coconut — 10-59-05 in purchased pastries for her as a gift?  A. Yes.  Q. Okay. Osomun what? Coconut — 10-59-17 in Q. Okay. Osomun who                                                                                                                                                        |     |                                                 | ı   |                                                                 |
| 6 A. No. 7 Q. Do you know when she first started to shop at Gibson's Bakery? 9 A. No. 10 Q. Okay. Does she – strike that. 11 Has she shopped at Gibson's Bakery in 12 2018? 12 2018? 13 A. I don't know. 14 Q. Okay. Do you have any knowledge as to how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's 10:58:26 how many times she has shopped at Gibson's Bakery? 16 Q. Have you had any discussions with her reparting Gibson's Bakery? 17 A. No. 18 Q. Have you had any discussions with her reparting Gibson's Bakery? 18 A. I don't recall. 19 Q. Okay. What has she told you? 20 A. I don't recall. 21 Q. Okay. What has she told you? 22 A. I'd amend that. She does like their pastries. 23 Q. Okay. 24 A. I'd amend that. She does like their pastries. 25 pastries. 26 Q. Okay. Good. 27 A. As gifts. 38 Q. Okay. Good. 39 C. As gifts? 40 A. As gifts. 41 Q. Okay. Good. 41 Q. Okay. Good. 42 A. As gifts. 43 Q. Okay. So are you saying that you've 10:59:05 purchased pastries for her as a gift? 44 A. Yes. 45 Q. Okay. So are you saying that you've 10:59:05 purchased pastries for her as a gift? 46 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 46 A. Yes. 47 Q. Okay. Do you read not gibson's Bakery? 48 A. Prescoonut. 49 Q. Okay. Do you read not gibson's Bakery? 40 A. Prescoonut what? Coconut — 10:59:17 life of the past your wife has ever made about Gibson's Bakery? 41 A. I don't recall any specific comments that your wife has ever made about Gibson's Bakery? 41 A. I don't recall any specific comments that your wife has ever made about Gibson's Bakery? 42 A. The any our wife has ever made about Gibson's Bake |     |                                                 | ı   |                                                                 |
| 7 Page 37  9 A. No. 10 Now, when she first started to shop at Gibson's Bakery? 9 A. No. 20187 10 Q. Okay. Does she – strike that. 10:58:11 11 Has she shopped at Gibson's Bakery in 11 12 20187 13 A. I don't know. 13 13 A. I don't know. 13 15 bow many times she has shopped at Gibson's 10:58:26 16 Bakery? 17 17 A. No. 18 19 Q. Have you had any discussions with her reparding Gibson's Bakery 19 10 A. Yes. 10:58:36 11 Q. Okay. What has she told you? 10:58:36 12 Q. Okay. What has she told you? 10:58:59 13 A. I don't remember any specific comments to you about Gibson's Bakery? 15 16 Q. Okay. Okay. 10:58:59 17 A. A sifts. 10:58:59 18 Q. Okay. Okay. 10:58:59 19 Dastries. 10:58:59 10 Q. Okay. Okay. 10:58:59 11 Q. Okay. Okay. 10:58:59 12 A. A sifts. 10:58:59 13 Q. Okay. 10:58:59 14 A. A sifts. 10:58:59 15 Q. Okay. Okay. 10:58:59 16 Q. Okay. Okay. 10:58:59 17 A. Yes. 10:58:59 18 Q. Okay. Okay. 10:58:59 19 Q. Okay. Okay. 10:58:59 10 Q. Okay. Okay. 10:58:59 11 Q. Okay. Okay. 10:58:59 12 Q. Okay. Okay. 10:58:59 13 Q. Okay. Okay. 10:58:59 14 A. A sifts. 10:58:59 15 Q. Okay. Okay. 10:58:59 16 Q. Okay. Okay. 10:58:59 17 A. Yes. 10:58:59 18 Q. Okay. Okay. 10:58:59 19 Q. Okay. Coconut what? Coconut — 10:59:17 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks, Coconut whatever. 10:59:17 12 Q. Okay. Okay. Okay. 10:59:32 13 Q. Okay.  | 5   |                                                 | ı   |                                                                 |
| shop at Gilsson's Bakery?  A. No.  Q. Okay. Does she – strike that.  10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                 | ı   |                                                                 |
| 9 A. No. 10 Q. Okay. Does she – strike that. 10:58:11 11 Has she shopped at Gibson's Bakery in 12 20187 13 A. I don't know. 14 Q. Okay. Do you have any knowledge as to 15 how many times she has shopped at Gibson's 10:58:26 16 Bakery? 17 A. No. 18 Q. Have you had any discussions with her 19 regarding Gibson's Bakery? 19 A. Yes. 10:58:36 20 A. Yes. 10:58:36 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their 25 pastries. 26 A. Ry gifts. 37 Q. Okay. Good. 27 A. As gifts. 38 Q. As gifts? 4 A. As gifts. 4 A. As gifts. 5 Q. Okay. Good. 5 Q. Okay. Good. 6 Q. Okay. Good. 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Oby our recall any comments that 10 Q. Okay. Op our recall any comments that 11 Q. Okay. Do you recall any comments that 12 Q. Okay. Which pastry does she like? 13 A. I don't recall any specific comments 14 A. I don't read about Gibson's Bakery? 15 Gibson's Bakery? 16 Q. Okay. Good. 17 Gibson's Bakery 18 A. Yes. 19 Q. Okay. Do you recall any specific comments 19 Q. Okay. Or you bare as gift? 20 A. Yes. 30 Q. Okay. Do you recall any specific comments that you have 31 likes shopping at Gibson's Bakery? 32 Q. Okay. Universe that any one who 11:01:59 33 Q. Okay. Which pastry does she like? 34 A. Yes. 35 Q. Okay. Which pastry does she like? 36 Q. Okay. Which pastry does she like? 37 A. Yes. 38 Q. Okay. Which pastry does she like? 39 A. She prefers coconut. 30 Q. Okay. Ocoonut what? Coconut — 10:59:17 31 A. Coconut haystacks. Coconut whatever. 32 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 39 A. In can only assume that along the 11:02:11 30 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 40 A. I don't recall any specific comments. 41 A. I don't recall any specific comments. 42 Q. Okay. B. I don't recall any specific comments. 43 Q. Okay. B. I don't recall any specific comments. 44 A. I don't any the specific comments. 45 Q. Okay. B | 7   |                                                 | l   |                                                                 |
| 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 8   | -                                               | 8   |                                                                 |
| 11 Has she shopped at Gibson's Bakery in 12 2018? 13 A. I don't know. 14 Q. Okay. Do you have any knowledge as to 15 how many times she has shopped at Gibson's 10:58:26 16 Bakery? 17 A. No. 18 Q. Have you had any discussions with her 19 regarding Gibson's Bakery? 10 A. Yes. 10:58:36 20 A. Yes. 10:58:36 21 Q. Okay. What has she told you? 21 A. I don't recall. 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their pastries. 25 parties. 26 A. Rill amend that. She does like their pastries. 27 D. Okay. 28 A. A sights. 3 Q. Okay. Do you remember any specific comments that you shop at Gibson's Bakery? 4 A. As gifts. 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 purchased pastries for her as a gift? 6 Q. Okay. Which pastry does she like? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers occorout. 10 Q. Okay. Which pastry does she like? 11 A. Cocount haystacks. Coconut what? 12 Q. Okay. Which pastry does she like? 13 A. I don't recall any specific comments to you about Gibson's Bakery? 14 A. I don't recall any specific comments that your wife never made any comments that your wife has ever made about Gibson's Bakery? 11 A. Cocount haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that your wife has ever made any comments that your wife has ever made any comments that your wife has ever made about Gibson's Bakery? 10 Q. Okay. So you precall any comments that your wife ever made any comments that your wife has ever wift. 14 A. I don't recall any specific comments that your wife has ever whe ade about Gibson's Bakery? 15 A. Are you asking if Iknow anyone who you have said that I have shopped at Gibson's Bakery. 16 Q. Okay. So are you saying that you've 10:59:17 17 A. The said anyon the made any comments that you have said that I have shopped a | 9   | A. No.                                          | 9   | So we're going to - I'm going to assert                         |
| 12   2018?     12   Q.     Has anyone ever made any comments to you about Gibson's Bakery upon learning that you have shorped at Gibson's Bakery intereshed how many times she has shopped at Gibson's Bakery   15   how many times she has shopped at Gibson's Bakery   15   A. Not to my knowledge.   11-01:09   15-8:26   16   Q. Okay. Notion my knowledge.   11-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:09   17-01:0   | 10  | Q. Okay. Does she strike that. 10:58:11         | 10  | the First Amendment privilege and instruct you 11:00:49         |
| 3   about Gibson's Bakery upon learning that you have shopped at Gibson's Bakery   11-01-09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 11  | Has she shopped at Gibson's Bakery in           | 11  | not to answer.                                                  |
| 14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 12  | 2018?                                           | 12  | <ul> <li>Q. Has anyone ever made any comments to you</li> </ul> |
| 15   how many times she has shopped at Gibson's   10:58:26   15   A. Not to my knowledge.   11:01:09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 13  | A. I don't know.                                | 13  | about Gibson's Bakery upon learning that you have               |
| 15   how many times she has shopped at Gibson's   10:58:26   15   A. Not to my knowledge.   11:01:09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 14  | Q. Okay. Do you have any knowledge as to        | 14  |                                                                 |
| 16 Bakery? 17 A. No. 18 Q. Have you had any discussions with her regarding Gibson's Bakery? 20 A. Yes. 10:58:36 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their pastries. 25 pastries. 10:58:59 Molnar Reporting Services, LLC (440) 340-6161  Page 35  1 Q. Okay. Good. 2 A. As gifts. 3 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers occonut. 10 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut whatever. 11 Q. Okay. Oy ou recall any one ments that you've a filt of the purchased pastries for her as a gift? 11 Q. Okay. So are you saying that you've 10:59:17 12 Q. Okay. Which pastry does she like? 13 A. She prefers occonut. 14 A. Coconut what? Coconut whatever. 15 Q. Okay. Oy ou don't recall any specific comments that you remember any specific your ever made any comments that you remember any general comments that you remember any general comments with a specific comments of the as a gift? 2 Q. Okay. Do you remember any general comments that you will pastry on the will be you? 2 A. Are you asking if I know anyone who 11:01:39  Page 37  1 Q. Okay. Good. 2 A. As gifts. 3 Q. Okay. So are you saying that you've 10:59:05 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers occonut. 10 Q. Okay. Oy you recall any open and you will be a filter by your wife has ever made about Gibson's Bakery? 11 A. I don't recall any specific comments and your wife has ever made any comments that your wife has ever made any comments that your wife has ever made any comments that your wife eve | 15  |                                                 | 15  |                                                                 |
| 17 A. No. 18 Q. Have you had any discussions with her 19 regarding Gibson's Bakery? 20 A. Yes. 10:58:36 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their 25 pastries. 26 Molnar Reporting Services, LLC (440) 340-6161  Page 35  1 Q. Okay. Good. 2 A. As gifts. 3 Q. Okay Good. 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers cocouut. 10 Q. Okay. Which pastry does she like? 10 Q. Okay. Which pastry does she like? 11 A. Coconut what? Coconut — 10:59:17 11 A. Coconut what? Coconut — 10:59:17 12 Q. Okay. Oyou recall any townernts that your wife has ever made about Gibson's Bakery? 14 A. I don't recall any specific comments that your wife has ever made about Gibson's Bakery? 19 Q. Okay. So green and eabout Gibson's Bakery? 10 Q. Okay. Oyou recall any comments that your wife has ever made about Gibson's Bakery? 10 Q. Okay. Oyou recall any comments that your wife has ever made about Gibson's Bakery? 10 Q. Okay. Oyou recall any specific comments that your wife ever made any comments that regarding David Gibson? 10 Q. Okay. Byour wife ever made any comments that your wife ever made any comments that regarding David Gibson? 10 Q. Okay. Byour remort, that regarding David Gibson? 10 Q. Okay. Byour remort, that any one of the wife of the remove of the comments that your wife ever made any comments that people have made to you? 25 A. Are you asking if I know any one who 11:01:39 26 A. Are said that you shop at Gibson's Bakery? 27 A. I wife any the people who are distoned by a guestion is you have and that have shopped at Gibson's Bakery? 28 Bakery based upon their knowledge that you shop at Gibson's Bakery? 29 A. I mean, I can only assume that along the path sometime, we've come into a conversation, but I don't have supercollection of what specific conversations or who they were with. 29 Q. Allyn D. Gibson? 20 A. Not to my memory, no. 10:59:41 20 Q | 16  |                                                 | 16  |                                                                 |
| 18 Q. Have you had any discussions with her regarding Gibson's Bakery? 19 A. Yes. 10:58:36 20 A. Yes. 10:58:36 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their pastries. 25 model of the pastry of the pastry of the pastry of the precision of the pastry of the pastry of the purchased pastries for her as a gift? 26 Q. Okay. So are you saying that you've 10:59:05 27 A. Yes. 28 Q. Okay. Which pastry does she like? 29 A. She prefers coconut. 20 Q. Okay. Which pastry does she like? 21 Q. Okay. Coconut what? Coconut — 10:59:17 22 Q. Okay. Coconut what? Coconut — 10:59:17 23 Q. Okay. Do you recall any specific comments that one. 24 A. Yes. 25 Day of the pastry of the pastry of the pastry of the purchased pastries for her as a gift? 26 Q. Okay. Which pastry does she like? 27 A. Yes. 28 Q. Okay. Okay. Coconut what? Coconut — 10:59:17 29 A. She prefers coconut. 30 Q. Okay. Coconut what? Coconut — 10:59:17 31 A. Coconut haystacks. Coconut whatever. 32 Q. Okay. Do you recall any specific comments that your wife has ever made any comments that your wife has ever made any comments that people who comments of the pastry of the p | 17  |                                                 | 17  |                                                                 |
| 19 regarding Gibson's Bakery? 20 A. Yes. 10:58:36 20 Qokay. What has she told you? 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their 24 comments that people have made to you? 25 pastries. 10:58:59 Molnar Reporting Services, LLC (440) 340-6161  Page 35  10 Q. Okay. Good. 21 likes shopping at Gibson's Bakery? 22 Q. No, no, no. My question is you have 38 said that you shop at Gibson's Bakery, correct? 24 A. Yes. 25 Q. Okay. So are you saying that you've 10:59:05 purchased pastries for her as a gift? 26 Q. Okay. Which pastry does she like? 27 A. She prefers coconut. 28 Q. Okay. Coconut what? Coconut — 10:59:17 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |                                                 | ľ   |                                                                 |
| 20 A Yes. 10:58:36 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their 25 pastries. 26 I O. Okay. 27 A. A I'll amend that. She does like their 28 Molnar Reporting Services, LLC (440) 340-6161  29 Page 35  1 Q. Okay. Good. 20 A. As gifts. 3 Q. As gifts. 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that you wife ever made any comments that you shop at Gibson's Bakery? 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that you wife ever made about Gibson's Bakery? 13 your wife has ever made about Gibson's Bakery? 14 A. I mean, I can only assume that along the path sometime, we've come into a conversation, but I don't have any recollection of what specific conversations or who they were with. 15 no. 10:59:32 16 Q. Has your wife ever made any comments 17 regarding David Gibson? 18 A. No. 10:59:41 20 A. Allyn W. Gibson? 21 A. I don't recember any specific comments and that along the path sometime, we've come into a conversation or who they were with. 21 Q. Okay. Have you ever seen any written comments from Owen Rarric? 11:02:48 22 A. Allyn W. Gibson? 21 A. Coold you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |                                                 | ł . |                                                                 |
| 21 Q. Okay. What has she told you? 22 A. I don't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their 25 pastries. 26 In amend that. She does like their 27 pastries. 28 In 10:58:59 29 Molnar Reporting Services, LLC (440) 340-6161  29 Page 35  20 Okay. 30 Okay. Do you remember any general comments that people have made to you? 31 A. Are you asking if I know anyone who in 11:01:39 32 Molnar Reporting Services, LLC (440) 340-6161  30 Okay. Good. 31 likes shopping at Gibson's Bakery? 32 Q. No, no, no. My question is you have said that you shop at Gibson's Bakery, correct? 33 A. As gifts. 34 A. As gifts. 35 Q. Okay. So are you saying that you've in 10:59:05 40 Okay. So are you saying that you've in 10:59:05 41 Q. Okay. Which pastry does she like? 42 Q. Okay. Coconut what? Coconut — 10:59:17 43 A. Coconut haystacks, Coconut whatever. 44 Q. Okay. Coconut what? Coconut — 10:59:17 45 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 45 A. I don't remember any specific comments that you shop at comments of the people have made to you? 46 A. Are you asking if I know anyone who in 11:01:39 4 A. As gifts. 4 A. Are you asking if I know anyone who in 11:01:39 4 A. As gifts. 5 Q. Okay. Good. 1 likes shopping at Gibson's Bakery? 2 Q. No, no, no. My question is you have said that you shop at Gibson's Bakery, sure. 11:01:54 4 A. Yes aid that I have shopped at in you shop at Gibson's Bakery at Gibson's Bakery? 4 A. Yes aid that I have shopped at in you shop at Gibson's Bakery? 5 Q. Okay. Coconut what? Coconut — 10:59:17 5 Q. Okay. Coconut what? Coconut — 10:59:17 6 Q. Okay. Do you recall any comments that you shop at Gibson's Bakery? 10 Q. Okay. Do you recall any comments that you with a path and you my have had with people who conversations or who they were with. 10 Q. Okay. Is there anything that would refresh your recollection as to any specific in 1:02:31 commented upon Gibson's Bakery? 11 A. I can't think of anything. 12 Q. Okay. Ilyn W. Gibson? 13 A. Not to my memory, no. 10:59 |     |                                                 |     |                                                                 |
| 22 A. Idon't recall. 23 Q. Okay. 24 A. I'll amend that. She does like their 25 pastries. 26 Molnar Reporting Services, LLC (440) 340-6161  27 Page 35  28 Page 35  1 Q. Okay. Good. 2 A. As gifts. 3 Q. As gifts. 3 Q. As gifts. 3 Q. Okay. So are you saying that you've 10:59:05 2 purchased pastries for her as a gift? 4 A. Yes. 4 Q. Okay. Which pastry does she like? 5 Q. Okay. Which pastry does she like? 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Cocomut whatever. 20 Q. Okay. Do you recuments that you were with. 21 Q. Okay. The part of the page 35  22 Q. No, no, no. My question is you have said that you shop at Gibson's Bakery, sure. 11:01:54  4 A. I've said that I have shopped at Gibson's Bakery, sure. 11:01:54  6 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Cocomut whatever. 12 Q. Okay. Do you reculal any comments that your wife has ever made about Gibson's Bakery? 13 your wife has ever made about Gibson's Bakery? 14 A. Idon't recall any specific comments, 12 path sometime, we've come into a conversation, 13 path sometime, we've come into a conversation, 14 path sometime, we've come into a conversation, 15 path sometime, we've come into a conversation, 15 path sometime, we've come into a conversation, 16 path sometime, we've come into a conversation, 16 path sometime, 17 path sometime, we've come i |     |                                                 | l   |                                                                 |
| 23 Q. Okay. Do you remember any general comments that people have made to you? 25 pastries. 10:58:59 Molnar Reporting Services, LLC (440) 340-6161  Page 35  Page 35  Page 37  Q. Okay. Good. 2 A. As gifts. 3 Q. Okay. Good. 2 A. As gifts? 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Which pastry does she like? 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you remember any general comments that you along at Gibson's Bakery, correct? 4 A. Tve said that I have shopped at Gibson's Bakery, correct? 4 A. Tve said that I have shopped at Gibson's Bakery, sure. 11:01:54 6 Q. Sure. And so my question is has anyone ever made any comments to you about Gibson's Bakery? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you remember any general comments that 10 gibson's Bakery? 13 specific comments that 11:02:11 14 A. Coconut haystacks. Coconut whatever. 15 no. 10:59:32 16 Q. Has your wife ever made any comments 17 regarding David Gibson? 18 A. I can't think of anything. 19 Q. Allyn W. Gibson? 19 Q. Allyn W. Gibson? 10:59:41 20 A. Not to my memory, no. 10:59:41 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |                                                 | ļ   |                                                                 |
| A. I'll amend that. She does like their pastries.  10:58:59  Molnar Reporting Services, LLC (440) 340-6161  Page 35  Page 35  Page 37  Q. Okay. Good.  A. As gifts.  Q. Okay. So are you saying that you've 10:59:05  purchased pastries for her as a gift?  A. Yes.  Q. Okay. Which pastry does she like?  A. She prefers coconut.  Q. Okay. Coconut what? Coconut — 10:59:17  A. Coconut haystacks. Coconut whatever.  Q. Okay. Do you recall any specific comments, your wife has ever made about Gibson's Bakery?  Q. Okay. It likes shopping at Gibson's Bakery?  Q. No, no, no. My question is you have said that Jue shopped at Gibson's Bakery, correct?  A. I ve said that I have shopped at Gibson's Bakery, correct?  A. Yes.  Gibson's Bakery, sure.  11:01:54  Q. Sure. And so my question is has anyone ever made any comments to you about Gibson's Bakery?  Bakery based upon their knowledge that you shop at Gibson's Bakery?  A. She prefers coconut.  D. Okay. Which pastry does she like?  Bakery based upon their knowledge that you shop at Gibson's Bakery?  A. I mean, I can only assume that along the 11:02:11 path sometime, we've come into a conversation, but I don't have any recollection of what your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments, 12 put I don't have any recollection of what your wife has ever made about Gibson's Bakery?  A. No.  Q. Has your wife ever made any comments  16 Q. Has your wife ever made any comments  17 regarding David Gibson?  A. No.  18 A. I can't think of anything.  Q. Okay. Have you ever seen any written statements or comments from Owen Rarric?  11:02:48  A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                    |     |                                                 |     |                                                                 |
| Page 35  Page 35  Page 37  Q. Okay. Good.  A. As gifts.  Q. Okay. So are you saying that you've 10:59:05  purchased pastries for her as a gift?  A. Yes.  Q. Okay. Which pastry does she like?  A. She prefers coconut.  Q. Okay. Which pastry does she like?  A. Coconut hat? Coconut what? Coconut - 10:59:17  A. Coconut haystacks. Coconut whatever.  Q. Okay. Do you recall any specific comments, and your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments, regarding David Gibson?  A. No.  Page 35  A. Are you asking if I know anyone who 11:01:39 Molnar Reporting Services, LLC (440) 340-6161  Page 37  A. Are you asking if I know anyone who 11:01:39 Molnar Reporting Services, LLC (440) 340-6161  Page 37  A. Are you asking if I know anyone who 11:01:39 Molnar Reporting Services, LLC (440) 340-6161  Page 37  A. As gifts.  2. Q. No, no, no. My question is you have said that you shop at Gibson's Bakery, correct?  4. A. Ive said that you shop at Gibson's Bakery, sure. 11:01:54  Q. Sure. And so my question is has anyone ever made any comments to you about Gibson's Bakery baked upon their knowledge that you shop at Gibson's Bakery based upon their knowledge that you shop at Gibson's Bakery based upon their knowledge that you shop at Gibson's Bakery?  A. Yes.  Bakery based upon their knowledge that you shop at Gibson's Bakery?  A. I mean, I can only assume that along the 11:02:11 path sometime, we've come into a conversation, but I don't have any recollection of what specific conversations or who they were with.  Q. Okay. By uur recollection of what specific on who in the proper who have any proper with path would refresh your recollection as to any specific 11:02:31 commented upon Gibson's Bakery?  A. Not to my memory, no. 10:59:41  A. Could you rephrase the question?                                                                                                                            |     | •                                               | l   |                                                                 |
| Molnar Reporting Services, LLC (440) 340-6161  Page 35  Page 37  Q. Okay. Good. A. As gifts. Q. As gifts? A. As gifts. Q. Okay. So are you saying that you've 10:59:05 Q. Okay. So are you saying that you've 10:59:05 Q. Okay. Which pastry does she like? A. Yes. Q. Okay. Which pastry does she like? A. She prefers coconut. Q. Okay. Coconut what? Coconut — 10:59:17 A. Coconut haystacks. Coconut whatever. Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? A. I don't recall lany specific comments, 14 A. I don't recall lany specific comments, 15 Q. Has your wife ever made any comments 17 regarding David Gibson? A. No. Q. Allyn W. Gibson? A. Not omy memory, no. 10:59:41 Q. Allyn D. Gibson? A. Not omy memory, no. 10:59:41 Q. Allyn D. Gibson? A. Roculd you rephrase the question? A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |     |                                                 |     |                                                                 |
| Page 35  1 Q. Okay. Good. 2 A. As gifts. 3 Q. As gifts? 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers occonut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 13 Bakery based upon their knowledge that you shop at Gibson's Bakery. 14 A. I don't recall any specific comments, 12 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 15 Q. Has your wife ever made any comments regarding David Gibson? 16 Q. Has your wife ever made any comments regarding David Gibson? 17 regarding David Gibson? 18 A. No. 19 Q. Allyn W. Gibson? 20 A. Not to my memory, no. 21 D. Sibson? 21 A. Could you rephrase the question? 22 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 23  | •                                               | 23  |                                                                 |
| 1 likes shopping at Gibson's Bakery? 2 A. As gifts. 3 Q. As gifts? 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 13 your wife has ever made about Gibson's Bakery? 14 A. I don't recall any specific comments, no. 10:59:32 15 refresh your recollection as to any specific 11:02:31 16 Q. Has your wife ever made any comments regarding David Gibson? 19 Q. Allyn W. Gibson? 10 Q. Allyn W. Gibson? 10 Q. Allyn W. Gibson? 11 likes shopping at Gibson's Bakery? 2 Q. No, no, no. My question is you have said that you shop at Gibson's Bakery, sure. 11:01:54 2 Q. Sure. And so my question is has anyone ever made any comments to you about Gibson's Bakery? 10 Q. Sure. And so my question is has anyone ever made any comments to you about Gibson's Bakery? 11 David Gibson's Bakery? 12 D. A. I mean, I can only assume that along the 11:02:11 path sometime, we've come into a conversation, but I don't have any recollection of what specific conversations or who they were with. 12 Q. Okay. Is there anything that would refresh your recollection as to any specific 11:02:31 conversations you may have had with people who commented upon Gibson's Bakery? 13 A. I can't think of anything. 14 A. I can't think of anything. 15 Q. Allyn D. Gibson? 16 Q. Allyn D. Gibson? 17 Countersations or comments from Owen Rarric? 11:02:48 21 Q. Allyn D. Gibson? 22 A. Not to my memory, no. 10:59:41 23 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                            |     | Wildlian Reporting Services, ELC (440) 340-0101 |     | Montal Reporting Services, Libe (440) 540-0101                  |
| 2 A. As gifts. 3 Q. As gifts? 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 5 Gibson's Bakery, sure. 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 10 A. I mean, I can only assume that along the 11:02:11 path sometime, we've come into a conversation, but I don't have any recollection of what your wife has ever made about Gibson's Bakery? 13 your wife has ever made about Gibson's Bakery? 14 A. I don't recall any specific comments, no. 10:59:32 15 refersh your recollection as to any specific 11:02:31 conversations you may have had with people who regarding David Gibson? 10:59:41 Q. Okay. Have you ever seen any written statements or comments from Owen Rarric? 11:02:48 21 Q. Allyn D. Gibson? 11:02:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     | Page 35                                         |     | Page 37                                                         |
| 3 Q. As gifts? 4 A. As gifts. 5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 13 your wife has ever made about Gibson's Bakery? 14 A. I don't recall any specific comments, no. 10:59:32 15 Q. Has your wife ever made any comments 17 regarding David Gibson? 18 A. No. 18 A. I can't think of anything. 19 Q. Allyn W. Gibson? 20 A. Not to my memory, no. 10:59:41 21 Q. Allyn D. Gibson? 22 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1   | Q. Okay. Good.                                  | 1   | likes shopping at Gibson's Bakery?                              |
| 4 A. I've said that I have shopped at  5 Q. Okay. So are you saying that you've 10:59:05 6 purchased pastries for her as a gift? 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery? 13 your wife has ever made about Gibson's Bakery? 14 A. I don't recall any specific comments, no. 10:59:32 16 Q. Has your wife ever made any comments regarding David Gibson? 17 regarding David Gibson? 18 A. No. 18 A. I can't think of anything. 19 Q. Allyn W. Gibson? 20 A. Not to my memory, no. 10:59:41 21 Q. Allyn D. Gibson? 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2   | A. As gifts.                                    | 2   | Q. No, no, no. My question is you have                          |
| Gibson's Bakery, sure.  Converted any comments to you about Gibson's  Bakery based upon their knowledge that you shop  at Gibson's Bakery?  A. I mean, I can only assume that along the 11:02:11  path sometime, we've come into a conversation,  but I don't have any recollection of what  your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments,  no.  10:59:32  Q. Has your wife ever made any comments  regarding David Gibson?  A. No.  Q. Allyn W. Gibson?  A. Not to my memory, no.  10:59:41  A. Could you rephrase the question?  Since I 11:01:54  Q. Sure. And so my question is has anyone  ever made any comments to you about Gibson's  Bakery based upon their knowledge that you shop  at Gibson's Bakery?  A. I mean, I can only assume that along the 11:02:11  path sometime, we've come into a conversation,  but I don't have any recollection of what  specific conversations or who they were with.  Q. Okay. Is there anything that would  refersh your recollection as to any specific 11:02:31  conversations you may have had with people who  commented upon Gibson's Bakery?  A. I can't think of anything.  Q. Okay. Have you ever seen any written  statements or comments from Owen Rarric? 11:02:48  A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3   | Q. As gifts?                                    | 3   | said that you shop at Gibson's Bakery, correct?                 |
| purchased pastries for her as a gift?  A. Yes.  Q. Okay. Which pastry does she like?  A. She prefers coconut.  Q. Okay. Coconut what? Coconut — 10:59:17  A. Coconut haystacks. Coconut whatever.  Q. Okay. Do you recall any comments that  your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments,  no. 10:59:32  Q. Has your wife ever made any comments  Q. Has your wife ever made any comments  A. No.  Q. Allyn W. Gibson?  A. Not to my memory, no. 10:59:41  Q. Okay. Sure. And so my question is has anyone  ever made any comments to you about Gibson's has enyone ever made any comments to you about Gibson's  Bakery based upon their knowledge that you shop  at Gibson's Bakery?  A. I mean, I can only assume that along the 11:02:11  path sometime, we've come into a conversation,  but I don't have any recollection of what  specific conversations or who they were with.  Q. Okay. Is there anything that would  refresh your recollection as to any specific 11:02:31  conversations you may have had with people who  commented upon Gibson's Bakery?  A. No.  A. I can't think of anything.  Q. Okay. Have you ever seen any written  statements or comments from Owen Rarric? 11:02:48  A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 4   | A. As gifts.                                    | 4   | A. I've said that I have shopped at                             |
| purchased pastries for her as a gift?  A. Yes.  Q. Okay. Which pastry does she like?  A. She prefers coconut.  Q. Okay. Coconut what? Coconut — 10:59:17  A. Coconut haystacks. Coconut whatever.  Q. Okay. Do you recall any comments that  your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments,  no. 10:59:32  Q. Has your wife ever made any comments  Q. Has your wife ever made any comments  A. No.  Q. Allyn W. Gibson?  A. Not to my memory, no. 10:59:41  Q. Okay. Sure. And so my question is has anyone  ever made any comments to you about Gibson's has enyone ever made any comments to you about Gibson's  Bakery based upon their knowledge that you shop  at Gibson's Bakery?  A. I mean, I can only assume that along the 11:02:11  path sometime, we've come into a conversation,  but I don't have any recollection of what  specific conversations or who they were with.  Q. Okay. Is there anything that would  refresh your recollection as to any specific 11:02:31  conversations you may have had with people who  commented upon Gibson's Bakery?  A. No.  A. I can't think of anything.  Q. Okay. Have you ever seen any written  statements or comments from Owen Rarric? 11:02:48  A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 5   | Q. Okay. So are you saying that you've 10:59:05 | 5   | Gibson's Bakery, sure. 11:01:54                                 |
| 7 A. Yes. 8 Q. Okay. Which pastry does she like? 9 A. She prefers coconut. 10 Q. Okay. Coconut what? Coconut — 10:59:17 10 A. I mean, I can only assume that along the 11:02:11 11 A. Coconut haystacks. Coconut whatever. 12 Q. Okay. Do you recall any comments that 13 your wife has ever made about Gibson's Bakery? 14 A. I don't recall any specific comments, 14 A. I don't recall any specific comments, 15 no. 10:59:32 15 refresh your recollection as to any specific 11:02:31 16 Q. Has your wife ever made any comments 16 conversations you may have had with people who 17 regarding David Gibson? 18 A. No. 18 A. I can't think of anything. 19 Q. Allyn W. Gibson? 19 Q. Okay. Have you ever seen any written 20 A. Not to my memory, no. 10:59:41 20 statements or comments from Owen Rarric? 11:02:48 21 Q. Allyn D. Gibson? 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 6   | purchased pastries for her as a gift?           | 6   | Q. Sure. And so my question is has anyone                       |
| 8Q. Okay. Which pastry does she like?8Bakery based upon their knowledge that you shop9A. She prefers coconut.9at Gibson's Bakery?10Q. Okay. Coconut what? Coconut — 10:59:1710A. I mean, I can only assume that along the 11:02:1111A. Coconut haystacks. Coconut whatever.11path sometime, we've come into a conversation,12Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery?13specific conversations or who they were with.14A. I don't recall any specific comments, no.14Q. Okay. Is there anything that would refresh your recollection as to any specific 11:02:3115no.10:59:3215refresh your recollection as to any specific 11:02:3116Q. Has your wife ever made any comments regarding David Gibson?16conversations you may have had with people who commented upon Gibson's Bakery?18A. No.18A. I can't think of anything.19Q. Allyn W. Gibson?19Q. Okay. Have you ever seen any written20A. Not to my memory, no.10:59:4120statements or comments from Owen Rarric?11:02:4821Q. Allyn D. Gibson?21A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7   |                                                 | 7   | ever made any comments to you about Gibson's                    |
| A. She prefers coconut.  Q. Okay. Coconut what? Coconut — 10:59:17  A. Coconut haystacks. Coconut whatever.  Q. Okay. Do you recall any comments that  your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments,  no. 10:59:32  Q. Has your wife ever made any comments  Regarding David Gibson?  A. No.  Q. Allyn W. Gibson?  A. Not to my memory, no. 10:59:41  Q. Okay. She prefers coconut.  9 at Gibson's Bakery?  10 A. I mean, I can only assume that along the 11:02:11  path sometime, we've come into a conversation,  but I don't have any recollection of what  specific conversations or who they were with.  12 Q. Okay. Is there anything that would  refresh your recollection as to any specific 11:02:31  conversations you may have had with people who  commented upon Gibson's Bakery?  A. I can't think of anything.  Q. Okay. Have you ever seen any written  20 A. Not to my memory, no. 10:59:41  Q. Allyn D. Gibson?  A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 8   | Q. Okay. Which pastry does she like?            | 8   |                                                                 |
| Q. Okay. Coconut what? Coconut — 10:59:17  A. Coconut haystacks. Coconut whatever.  Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments, no. 10:59:32  Q. Has your wife ever made any comments  Q. Has your wife ever made any comments  A. No. 12  Q. Okay. Is there anything that would refresh your recollection as to any specific 11:02:31  conversations you may have had with people who regarding David Gibson?  A. No. 12  Q. Okay. Is there anything that would refresh your recollection as to any specific 11:02:31  Conversations you may have had with people who regarding David Gibson?  A. No. 18  A. I can't think of anything.  Q. Okay. Have you ever seen any written  20  A. Not to my memory, no. 10:59:41  Q. Allyn D. Gibson?  A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 9   |                                                 | 9   | at Gibson's Bakery?                                             |
| A. Coconut haystacks. Coconut whatever.  11 path sometime, we've come into a conversation,  12 Q. Okay. Do you recall any comments that  13 your wife has ever made about Gibson's Bakery?  14 A. I don't recall any specific comments,  15 no.  10:59:32  15 refresh your recollection as to any specific 11:02:31  16 Q. Has your wife ever made any comments  17 regarding David Gibson?  18 A. No.  19 Q. Allyn W. Gibson?  10:59:41  20 Statements or comments from Owen Rarric?  11 path sometime, we've come into a conversation,  12 but I don't have any recollection of what  13 specific conversations or who they were with.  14 Q. Okay. Is there anything that would  15 refresh your recollection as to any specific 11:02:31  16 conversations you may have had with people who  17 commented upon Gibson's Bakery?  18 A. I can't think of anything.  19 Q. Okay. Have you ever seen any written  20 A. Not to my memory, no.  10:59:41  20 statements or comments from Owen Rarric?  11:02:48  21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 10  | •                                               | 10  | A. I mean, I can only assume that along the 11:02:11            |
| Q. Okay. Do you recall any comments that your wife has ever made about Gibson's Bakery?  A. I don't recall any specific comments, no. 10:59:32 15 refresh your recollection as to any specific 11:02:31  Q. Has your wife ever made any comments regarding David Gibson? 17 commented upon Gibson's Bakery?  A. No. 18 A. I can't think of anything. Q. Allyn W. Gibson? 19 Q. Okay. Have you ever seen any written Q. Okay. Is there anything that would refresh your recollection as to any specific 11:02:31 conversations you may have had with people who commented upon Gibson's Bakery? A. I can't think of anything. Q. Okay. Have you ever seen any written Q. Okay. Have you ever seen any written A. Not to my memory, no. 10:59:41 20 statements or comments from Owen Rarric? 11:02:48 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                 | l   |                                                                 |
| your wife has ever made about Gibson's Bakery?  1 A. I don't recall any specific comments, 10:59:32  1 C. Has your wife ever made any comments 1 Conversations or who they were with. 1 Q. Okay. Is there anything that would 1 refresh your recollection as to any specific 11:02:31 1 conversations you may have had with people who 1 commented upon Gibson's Bakery? 1 A. No. 1 Can't think of anything. 1 Q. Okay. Have you ever seen any written 2 Okay. Have you ever seen any written 3 Okay. Have you ever seen any written 2 Okay. Have you ever seen any written 3 Okay. Have you ever seen any written 4 Okay. Have you ever seen any written                                                                                                                               |     |                                                 | I . |                                                                 |
| A. I don't recall any specific comments,  10:59:32  15 refresh your recollection as to any specific 11:02:31  16 Q. Has your wife ever made any comments  17 regarding David Gibson?  18 A. No.  19 Q. Allyn W. Gibson?  20 A. Not to my memory, no.  10:59:41  21 Q. Okay. Is there anything that would  15 refresh your recollection as to any specific 11:02:31  16 conversations you may have had with people who commented upon Gibson's Bakery?  18 A. I can't think of anything.  19 Q. Okay. Have you ever seen any written  20 statements or comments from Owen Rarric? 11:02:48  21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |                                                 | 1   |                                                                 |
| 15 no. 10:59:32 15 refresh your recollection as to any specific 11:02:31  16 Q. Has your wife ever made any comments 16 conversations you may have had with people who 17 regarding David Gibson? 17 commented upon Gibson's Bakery?  18 A. No. 18 A. I can't think of anything.  19 Q. Allyn W. Gibson? 19 Q. Okay. Have you ever seen any written 20 A. Not to my memory, no. 10:59:41 20 statements or comments from Owen Rarric? 11:02:48 21 Q. Allyn D. Gibson? 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     | •                                               | ľ   |                                                                 |
| 16Q. Has your wife ever made any comments16conversations you may have had with people who17regarding David Gibson?17commented upon Gibson's Bakery?18A. No.18A. I can't think of anything.19Q. Allyn W. Gibson?19Q. Okay. Have you ever seen any written20A. Not to my memory, no.10:59:4120statements or comments from Owen Rarric?11:02:4821Q. Allyn D. Gibson?21A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     |                                                 | i   |                                                                 |
| 17regarding David Gibson?17commented upon Gibson's Bakery?18A. No.18A. I can't think of anything.19Q. Allyn W. Gibson?19Q. Okay. Have you ever seen any written20A. Not to my memory, no.10:59:4120statements or comments from Owen Rarric?11:02:4821Q. Allyn D. Gibson?21A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |     |                                                 | 1   |                                                                 |
| 18 A. No. 19 Q. Allyn W. Gibson? 19 Q. Allyn W. Gibson? 20 A. Not to my memory, no. 21 Q. Allyn D. Gibson? 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     | · ·                                             | 1   |                                                                 |
| 19Q. Allyn W. Gibson?19Q. Okay. Have you ever seen any written20A. Not to my memory, no.10:59:4120statements or comments from Owen Rarric?11:02:4821Q. Allyn D. Gibson?21A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |     | ~ ~                                             | 1   |                                                                 |
| 20 A. Not to my memory, no. 10:59:41 20 statements or comments from Owen Rarric? 11:02:48 21 Q. Allyn D. Gibson? 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |     |                                                 |     |                                                                 |
| Q. Allyn D. Gibson? 21 A. Could you rephrase the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |     |                                                 |     |                                                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     |                                                 |     |                                                                 |
| 44 A. Agail, holio hiy inchiory, ho.   1/42 U. Burg, have you ever seen any documents                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |     |                                                 |     |                                                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     | - · · · · · · · · · · · · · · · · · · ·         | 1   |                                                                 |
| C> F                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 4.5 |                                                 | 1   |                                                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     | Dakery /                                        | 24  | A. I defieve the seen them in news                              |
| <b>,</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 24  |                                                 | 2 5 | 11.02.20                                                        |
| Molnar Reporting Services, LLC (440) 340-6161 Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |     | A. No. 10:59:50                                 | 25  | coverage, yes. 11:03:29                                         |

|                                                                                                           | Page 38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                | Page 40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                         | Q. When you say "in news coverage," are you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                                              | I'm going to represent to you that the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2                                                                                                         | saying in news articles?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2                                                                                                              | gentleman who just nodded is Mr. Rarric.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3                                                                                                         | A. I believe so.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 3                                                                                                              | A. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 4                                                                                                         | Q. Okay. And what was the news article or                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4                                                                                                              | Q. Did you speak to him today?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 5                                                                                                         | news articles where you saw something attributed 11:03:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 5                                                                                                              | A. Yes. 11:07:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6                                                                                                         | to Mr. Rarric?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 6                                                                                                              | Q. Okay. And you met him today when you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7                                                                                                         | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 7                                                                                                              | were coming to your deposition, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8                                                                                                         | Q. Okay. Do you know on how many                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 8                                                                                                              | A. We talked this morning, yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 9                                                                                                         | occasions, if more than once, you have seen news                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9                                                                                                              | Q. Okay. As you look at him now, have you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10                                                                                                        | articles referencing Owen Rarric? 11:04:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 10                                                                                                             | ever met him in person before? 11:07:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 11                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 11                                                                                                             | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 12                                                                                                        | Q. Have you ever seen a press release                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 12                                                                                                             | Q. Okay. What did he say to you this                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 13                                                                                                        | issued by strike that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 13                                                                                                             | morning?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 14                                                                                                        | You know what a press release is,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 14                                                                                                             | A. So far as I recall, we exchanged                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 15                                                                                                        | correct? 11:04:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 15                                                                                                             | pleasantries and a handshake. 11:07:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 16                                                                                                        | A. Correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 16                                                                                                             | Q. Okay. Anything else?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 17                                                                                                        | Q. Okay, Have you ever seen a press                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 17                                                                                                             | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 18                                                                                                        | release or a press statement of any kind that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 18                                                                                                             | Q. Seeing him today sitting at this table,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 19                                                                                                        | Owen Rarric provided to the news media?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 19                                                                                                             | does that refresh your recollection as to whether                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 20                                                                                                        | A. I don't recall. 11:04:36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 20                                                                                                             | you've ever met him in person before? 11:07:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 21                                                                                                        | Q. Okay. In any of the articles that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 21                                                                                                             | A. I've met a lot of people. I'm sorry,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 22                                                                                                        | you've written for the paper, have you ever cited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 22                                                                                                             | Q. Okay. But my question is not about a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 23                                                                                                        | a press release or written statement issued by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 23                                                                                                             | lot of people. My question is about him.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 24                                                                                                        | Mr. Rarrie?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 24                                                                                                             | Having seen him, having seen him today                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 25                                                                                                        | A. I don't know. 11:04:55                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 25                                                                                                             | and looking at him right now, have you ever seen 11:07:51                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2.0                                                                                                       | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 23                                                                                                             | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                           | Monate Reporting Services, 220 (110) 310 Services                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                | Trong Reporting Services, SDC (110) 510 0101                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                           | Page 39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                | Page 41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1                                                                                                         | Q. Have you ever talked to Owen Rarric?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 1                                                                                                              | Mr. Rarric today, before this deposition?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2                                                                                                         | MR, KESLAR: Objection. Reporter's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2                                                                                                              | A. I'm unsure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3                                                                                                         | privilege, First Amendment of the U.S.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                | O Olsey Callette on to November 2016                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 3                                                                                                              | <ul><li>Q. Okay. So let's go to November 2016,</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 4                                                                                                         | Constitution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 4                                                                                                              | okay?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5                                                                                                         | Constitution. You don't have to answer that. 11:05:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 4                                                                                                              | okay?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5                                                                                                         | You don't have to answer that. 11:05:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 4<br>5                                                                                                         | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5<br>6                                                                                                    | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 4<br>5<br>6                                                                                                    | okay?  A. Yes, sir.  Q. You were a reporter, editor at that                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5<br>6<br>7                                                                                               | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you?  MR. KESLAR: Objection. Goes to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 4<br>5<br>6<br>7                                                                                               | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for?                                                                                                                                                                                                                                                                                                                                                                                                          |
| 5<br>6<br>7<br>8                                                                                          | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you?  MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege.  I'm going to instruct you not to answer. 11:05:42                                                                                                                                                                                                                                                                                                                                                                                                                     | 4<br>5<br>6<br>7<br>8                                                                                          | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49                                                                                                                                                                                                                                                                                                                                                           |
| 5<br>6<br>7<br>8<br>9                                                                                     | You don't have to answer that. 11:05:28 Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 4<br>5<br>6<br>7<br>8<br>9                                                                                     | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media.                                                                                                                                                                                                                                                                                                                                                    |
| 5<br>6<br>7<br>8<br>9                                                                                     | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you?  MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege.  I'm going to instruct you not to answer. 11:05:42                                                                                                                                                                                                                                                                                                                                                                                                                     | 4<br>5<br>6<br>7<br>8<br>9                                                                                     | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49                                                                                                                                                                                                                                                                                                                                                           |
| 5<br>6<br>7<br>8<br>9<br>10                                                                               | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you?  MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege.  I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person?                                                                                                                                                                                                                                                                                                                                                                         | 4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media.                                                                                                                                                                                                                                                                                                                                                    |
| 5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you?  MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege.  I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person?  A. I don't know.                                                                                                                                                                                                                                                                                                                                                       | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media?                                                                                                                                                                                                                                                                                          |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42 Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside                                                                                                                                                                                                                                                                                                                  | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S.                                                                                                                                                                                                                                                                                                    |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42 Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your                                                                                                                                                                                                                                                                         | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media                                                                                                                                                                                                                            |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42 Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24                                                                                                                                                                                                                                              | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02                                                                                                                                                                                                                                                                     |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42 Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24 A. I don't know.                                                                                                                                                                                                                             | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located? A. Our office was a Civitas Media office.                                                                                                                                                                         |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this                                                                                                                                                                                   | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located? A. Our office was a Civitas Media office. If you're asking about the headquarters, it was                                                                                                                         |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this conference room now?                                                                                                                                                              | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located? A. Our office was a Civitas Media office. If you're asking about the headquarters, it was in the Carolinas. 11:09:23                                                                                              |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this conference room now? A. I don't remember who all the people at the table are, no. 11:06:48  Q. Okay.                                                                              | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located? A. Our office was a Civitas Media office. If you're asking about the headquarters, it was                                                                                                                         |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this conference room now? A. I don't remember who all the people at the table are, no. 11:06:48                                                                                        | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | okay? A. Yes, sir. 11:08:39 Q. You were a reporter, editor at that time, correct? A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49 Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located? A. Our office was a Civitas Media office. If you're asking about the headquarters, it was in the Carolinas. 11:09:23                                                                                              |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this conference room now? A. I don't remember who all the people at the table are, no. 11:06:48  Q. Okay.                                                                              | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | okay?  A. Yes, sir. 11:08:39  Q. You were a reporter, editor at that time, correct?  A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49  Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located?  A. Our office was a Civitas Media office.  If you're asking about the headquarters, it was in the Carolinas. 11:09:23 Q. Okay. Do you know where in the Carolinas?  A. I don't remember. I never went there. |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this conference room now? A. I don't remember who all the people at the table are, no. 11:06:48  Q. Okay. A. Honestly, sir, if pressed for your name,                                  | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | okay?  A. Yes, sir. 11:08:39  Q. You were a reporter, editor at that time, correct?  A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49  Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located?  A. Our office was a Civitas Media office.  If you're asking about the headquarters, it was in the Carolinas. 11:09:23 Q. Okay. Do you know where in the Carolinas?                                           |
| 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | You don't have to answer that. 11:05:28  Q. Has Mr. Rarric ever reached out to you? MR. KESLAR: Objection. Goes to the editorial process, which is covered by the First Amendment privilege. I'm going to instruct you not to answer. 11:05:42  Q. Have you ever met Mr. Rarric in person? A. I don't know. Q. Were you talking to Mr. Rarric inside this law firm prior to the start of your deposition today? 11:06:24  A. I don't know. Q. Do you know if Mr. Rarric is in this conference room now? A. I don't remember who all the people at the table are, no. 11:06:48 Q. Okay. A. Honestly, sir, if pressed for your name, I wouldn't be able to produce it. | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | okay?  A. Yes, sir. 11:08:39  Q. You were a reporter, editor at that time, correct?  A. Yes. Q. Okay. Who were you working for? A. At the time, it was called Civitas 11:08:49  Media. Q. Can you spell that for me? A. C-I-V-I-T-A-S. Q. Media? A. Correct. 11:09:02 Q. At that time, where was Civitas Media located?  A. Our office was a Civitas Media office.  If you're asking about the headquarters, it was in the Carolinas. 11:09:23 Q. Okay. Do you know where in the Carolinas?  A. I don't remember. I never went there. |

|                                                                                                                          | Page 42                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Page 44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                        | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1 MR. HOLMAN: Again, I would vehemently                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2                                                                                                                        | Q. Okay. Which ones?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2 disagree. I don't believe that that privilege                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3                                                                                                                        | A. The Amherst News Times.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3 protects such an innocent question as what were                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4                                                                                                                        | Q. I'm sorry?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4 your responsibilities as editor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5                                                                                                                        | A. The Amherst News Times, the Oberlin News 11:09:51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 5 MR. KESLAR; And I think that the 11:12:50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 6                                                                                                                        | Tribune, the Wellington Enterprise, the Lorain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 6 question at this size of a newspaper goes much                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 7                                                                                                                        | County Community Guide, the Lima News.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 7 farther than that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8                                                                                                                        | Q. Lima?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Q. Can you describe generally for me what                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 9                                                                                                                        | A. L-I-M-A.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9 an editor does?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 10                                                                                                                       | Q. Um-hum, 11:10:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 10 A. It might vary from location to location 11:13:05                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11<br>12                                                                                                                 | A. And various others. I'm sorry. I don't have a list.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <ul> <li>11 based on the employer.</li> <li>12 Q. Okay. And for your particular employer,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 13                                                                                                                       | Q. In Ohio?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 13 what were the general responsibilities of an                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 14                                                                                                                       | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 14 editor?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 15                                                                                                                       | Q. Okay. In November 2016, were you 11:10:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 15 A. It might vary from location to location. 11:13:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 16                                                                                                                       | assigned to work for one or more of those                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 16 Q. Let's say that the editor worked in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 17                                                                                                                       | newspapers?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 17 Lorain County. How would you describe the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 18                                                                                                                       | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 18 general responsibilities of an editor working for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 19                                                                                                                       | Q. Okay. Which one or which ones?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 19 Civitas Media?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 20                                                                                                                       | A. The Amherst News Times, Oberlin News 11:10:49                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 20 A. I'm unclear on whether your question is 11:13:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 21                                                                                                                       | Tribune, Wellington Enterprise, and the Lorain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 21 specific to Civitas Media or general.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 22                                                                                                                       | County Community Guide.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 22 Q. Okay. I'll rephrase it then.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 23                                                                                                                       | Q. What population does the Amherst News                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 23 So as an editor for Civitas Media, did                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 24                                                                                                                       | Times serve?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 24 your duties include going to news events?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 25                                                                                                                       | A. The population of Amherst. 11:11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 25 A. Yes. 11:14:08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                          | Page 43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Page 45                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| -                                                                                                                        | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1 Q. As an editor with Civitas Media, did                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2                                                                                                                        | Q. Okay.  A. As well as Amherst Township, surrounding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1 Q. As an editor with Civitas Media, did 2 your duties include talking to people whom you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2                                                                                                                        | A. As well as Amherst Township, surrounding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul> <li>your duties include talking to people whom you</li> <li>believed had newsworthy information?</li> <li>A. Yes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2<br>3                                                                                                                   | <ul> <li>A. As well as Amherst Township, surrounding townships, and parts of Lorain.</li> <li>Q. What population does the Oberlin News</li> <li>Tribune serve?</li> <li>11:11:42</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <ul> <li>your duties include talking to people whom you</li> <li>believed had newsworthy information?</li> <li>A. Yes.</li> <li>Q. As an editor, did your job include 11:14:34</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6                                                                                                    | <ul> <li>A. As well as Amherst Township, surrounding townships, and parts of Lorain.</li> <li>Q. What population does the Oberlin News</li> <li>Tribune serve? 11:11:42</li> <li>A. The Oberlin population as well as</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ul> <li>your duties include talking to people whom you</li> <li>believed had newsworthy information?</li> <li>A. Yes.</li> <li>Q. As an editor, did your job include 11:14:34</li> <li>editing potential news articles that might appear</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                               | <ul> <li>A. As well as Amherst Township, surrounding townships, and parts of Lorain.</li> <li>Q. What population does the Oberlin News</li> <li>Tribune serve? 11:11:42</li> <li>A. The Oberlin population as well as surrounding townships.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <ul> <li>your duties include talking to people whom you</li> <li>believed had newsworthy information?</li> <li>A. Yes.</li> <li>Q. As an editor, did your job include 11:14:34</li> <li>editing potential news articles that might appear in one or more newspapers?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | A. As well as Amherst Township, surrounding townships, and parts of Lorain. Q. What population does the Oberlin News Tribune serve? 11:11:42 A. The Oberlin population as well as surrounding townships. Q. What about Wellington Enterprise?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <ul> <li>your duties include talking to people whom you</li> <li>believed had newsworthy information?</li> <li>A. Yes.</li> <li>Q. As an editor, did your job include 11:14:34</li> <li>editing potential news articles that might appear</li> <li>in one or more newspapers?</li> <li>A. Yes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | <ul> <li>A. As well as Amherst Township, surrounding townships, and parts of Lorain.</li> <li>Q. What population does the Oberlin News</li> <li>Tribune serve? <ul> <li>The Oberlin population as well as surrounding townships.</li> <li>Q. What about Wellington Enterprise?</li> <li>A. The Village of Wellington and its</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                       | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes.  Q. As an editor, did your job include                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59                                                                                                                                                                                                                                                                                                                                                                                                                                    | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?                                                                                                                                                                                                                                                                                                                                                                                                           | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.                                                                                                                                                                                                                                                                                                                                                                                     | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community                                                                                                                                                                                                                                                                                                                                              | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | A. As well as Amherst Township, surrounding townships, and parts of Lorain. Q. What population does the Oberlin News Tribune serve? 11:11:42 A. The Oberlin population as well as surrounding townships. Q. What about Wellington Enterprise? A. The Village of Wellington and its surrounding townships. 11:11:59 Q. Where is Wellington? A. In Lorain County. Q. What about Lorain County Community Guide?                                                                                                                                                                                                                                                                                                                                              | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for or invades on the editorial process. It                                                                                                                                                                                                                                                                                                                                                                                  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11                                                                                                                                                                                                                                                                                 | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships.  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.                                                                                                                                                                                                                                                                              | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution.                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position                                                                                                                                                                                                                        | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question.                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?                                                                                                                                                                                                    | your duties include talking to people whom you believed had newsworthy information?  A. Yes.  Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include                                                                                                                                                                                             |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?  A. Editor.                                                                                                                                                                                        | your duties include talking to people whom you believed had newsworthy information?  A. Yes. Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include deciding which articles were published and which                                                                                                                                             |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?  A. Editor.  Q. Can you describe for me what your 11:12:23                                                                                                                                         | your duties include talking to people whom you believed had newsworthy information?  A. Yes. Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include deciding which articles were published and which articles were not published? 11:15:27                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?  A. Editor.  Q. Can you describe for me what your 11:12:23 responsibilities were in November 2016 as editor?                                                                                       | your duties include talking to people whom you believed had newsworthy information?  A. Yes. Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include deciding which articles were published and which articles were not published? 11:15:27 MR. KESLAR: Same objection.                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?  A. Editor.  Q. Can you describe for me what your 11:12:23 responsibilities were in November 2016 as editor?  MR. KESLAR: Objection. That gets to                                                  | your duties include talking to people whom you believed had newsworthy information?  A. Yes. Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers?  A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include deciding which articles were published and which articles were not published? 11:15:27 MR. KESLAR: Same objection.                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?  A. Editor.  Q. Can you describe for me what your 11:12:23 responsibilities were in November 2016 as editor?                                                                                       | your duties include talking to people whom you believed had newsworthy information?  A. Yes. Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers? A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published? MR. KESLAR: Objection. Question calls for—or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include deciding which articles were published and which articles were not published? 11:15:27 MR. KESLAR: Same objection. I'm instructing you not to answer.                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A. As well as Amherst Township, surrounding townships, and parts of Lorain.  Q. What population does the Oberlin News Tribune serve? 11:11:42  A. The Oberlin population as well as surrounding townships.  Q. What about Wellington Enterprise?  A. The Village of Wellington and its surrounding townships. 11:11:59  Q. Where is Wellington?  A. In Lorain County.  Q. What about Lorain County Community Guide?  A. It's distributed to the southern half of 11:12:11 the county.  Q. In November 2016, what was your position with Civitas Media?  A. Editor.  Q. Can you describe for me what your 11:12:23 responsibilities were in November 2016 as editor?  MR. KESLAR: Objection. That gets to the editorial process and therefore is protected | your duties include talking to people whom you believed had newsworthy information?  A. Yes. Q. As an editor, did your job include 11:14:34 editing potential news articles that might appear in one or more newspapers? A. Yes. Q. As an editor, did your job include deciding or participating in deciding which 11:14:58 articles appeared and were published or not published?  MR. KESLAR: Objection. Question calls for — or invades on the editorial process. It goes to the state of mind and is protected by the 11:15:14 First Amendment to the U.S. Constitution. You don't have to answer that question. Q. As an editor, did your job include deciding which articles were published and which articles were not published? 11:15:27 MR. KESLAR: Same objection. I'm instructing you not to answer. Q. So who at Civitas Media would play a |

| 1 MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you  1 next day, which would be Thursday, which would be Thursday, 10 next day, which would be Thursday, November 10th, 2 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. 9 Q. Okay. Do you know if there were 11:21 demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016? 9 A. Assuming that they started on Thursday,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| It invades the editorial process   2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 10   |
| You don't have to answer that question.  Q. As an editor at the paper, would you talk to people help to write news articles? A. Yes. Q. As an editor, would you talk to people person to person for news information? A. Yes. Q. As an editor, would you have 11:16:24 Conversations with people on the telephone to gather information about potential news stories? A. Yes. Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:24 information for potential news articles? A. Yes. Q. Okay. Did Mr. Rarric ever e-mail you? A. Yes. A. Again, Td have to look at the ollock at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to look at the dates, but that seems plausible. A. Again, Td have to lo | 10   |
| 4 A. For sun, yes. 5 help to write news articles? 6 A. Yes. 7 Q. As an editor, would you talk to people 8 person to person for news information? 9 A. Yes. 10 Q. As an editor, would you have 11:16:24 10 tonversations with people on the telephone to gather information about potential news stories? 11 A. Yes. 12 Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42 16 information for potential news articles? 11 A. Yes. 12 Q. Okay. So let me just rephrase the 11:20:23 So there is a robbery that took place at distons Bakery on Stedendardy, 11:20:34 10 tonversations with people on the telephone to gather information about potential news stories? 14 Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42 16 information for potential news articles? 16 Q. Okay. Did Mr. Rarric ever e-mail you? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process and his news gathering. It's protected by the First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it goes to the editorial process are into you that Tuesday, You don't have to answer that question. 25 Q. So I will represent to you that Tuesday, 9 November 9, 2016, okay? 26 A. Fine. 27 A. Fine. 28 A. Fine. 39 There is a shoplifting incident that there was a shoplifting incident that the there was a shoplifting incident that oncoursed at Gibson's Bakery on Wendersday, November 9, 2016 ok at the police report, but that stouds like a plausible date. 22 Q. Okay. Do you know whether there were demonstrations that took place in front of Gibson's Bakery and around Gibson's Ba | 10   |
| belp to write news articles?  A. Yes.  Q. As an editor, would you talk to people person to person for news information?  A. Yes.  Q. As an editor, would you have 11:16:24 conversations with people on the telephone to gather information about potential news stories?  A. Yes.  Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42 information for potential news articles?  A. Yes.  A. Yes.  Q. Okay. Did Mr. Rarric ever e-mail you?  MR. KESLAR: Objection. Same objection and his news gathering. It's protected by the you don't have to answer that question.  Q. Did you ever e-mail Mr. Rarric? 11:17:15  Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's impublished. First amendment of the U.S. Constitution.  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's impublished. First amendment of the U.S. Constitution.  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's impublished. First amendment of the U.S. Constitution.  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's impublished. First amendment of the U.S. Constitution.  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's impublished. First amendment of the U.S. Constitution.  Page 47  A. Yes, in.  Q. So let's turn again — let' | 10   |
| 6 A. Yes. 7 Q. As an editor, would you talk to people 8 person to person for news information? 9 A. Yes. 10 Q. As an editor, would you have 11:16:24 11 conversations with people on the telephone to gather information about potential news stories? 12 gather information about potential news stories? 13 A. Yes. 14 Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42 information for potential news articles? 16 information for potential news articles? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection as I had the last time you asked this same 11:17:02 and his news gathering. It's protected by the 22 and his news gathering. It's protected by the 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, November 2 (1):19:25 11 A. Yes, sir. 12 Q. Okay. Ad cutting to the chase here, would you agree with me that the shoplithing incident that occurred in front of Gibson's Bakery on Wednesday, November 9, 2016; 11:21. 9 Okay. So I wail they started on Thursday, 11:20:34 11 A. Yes, sir. 12 Q. Okay. Ad cutting to the chase here, would you have written took place 13 on Wednesday, November 9, 2016; 11:29. 14 Okay. So I want to turn your attention to the course that thost place on Friday, November 9, 2016; 0. Q. And all of my questions that Fin going 11:22. 15 Okay. So I want to turn your attention to the course that the shoplithing incident that firm going 11:22. 16 Okay. So I want to turn your attention to the vest that took place on Friday, November 9, 2016;  | 10   |
| 7 Q. As an editor, would you talk to people 8 person to person for news information? 9 A. Yes. 10 Q. As an editor, would you have 11:16:24 11 conversations with people on the telephone to 22 gather information about potential news stories? 13 A. Yes. 14 Q. As an editor, would you e-mail people 25 and invite them to e-mail you in order to gather 11:16:42 15 16 information for potential news articles? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection 22 and his news gathering. It's protected by the 23 end in his news gathering. It's protected by the 24 You don't have to answer that question. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 26 Q. Did you ever e-mail Mr. Rarric? 27 MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 28 Page 47 29 MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again  | 10   |
| 8 person to person for news information? 9 A. Yes. 10 Q. As an editor, would you have 11:16:24 11 conversations with people on the telephone to 12 gather information about potential news stories? 13 A. Yes. 14 Q. As an editor, would you e-mail people 15 and information for potential news articles? 16 information for potential news articles? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection 20 as I had the last time you saked this same 11:17:02 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 26 Q. Did you ever e-mail Mr. Rarric? 27 Amendment of the U.S. Constitution. 28 You don't have to answer that question. 39 Amendment of the U.S. Constitution. 40 You don't have to answer that question. 51 Q. So let's turn again — let's turn gain | 10   |
| A Yes.  Q. As an editor, would you have 11:16:24 11 conversations with people on the telephone to gather information about potential news stories?  A Yes.  Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42  16 information for potential news articles?  A Yes.  18 Q. Okay. Did Mr. Rarrie ever e-mail you?  as I had the last time you asked this same 11:17:02  as I had the last time you asked this same 11:17:02  and his news gathering. It's protected by the goes to his reporting. Everyces, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. Everyces, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's umpublished. First Amendment of the U.S. Constitution.  A You don't have to answer that question.  MR. KESLAR: Same objection because it goes to his reporting. It's umpublished. First Amendment of the U.S. Constitution.  A You don't have to answer that question.  A Fine.  Q. Okay. Do you know if there were 11:21  to knowember 3, 2016, was Ill-ction Day. Would you agree with me that the states, but that sounds like a plausible date.  2 goes to his reporting. It's umpublished. First Amendment of the U.S. Constitution.  A Fine.  Q. Okay. Ox know whether there were 11:21  A Fine.  Q. Okay. Ox know if there were 11:21  A Page 47  A Fine.  Q. Okay. Ox know if there were 11:21  A You don't have to answer that question.  A Fine.  Q. Ox let's turn again — let's turn again in — let's turn again in — let's turn again in — let's turn again turn — let's turn again turn of Gibson's Bakery and around Gibson's Bakery on Friday, November 3, 2016, was Ill-ction Day. Would you agree with me that the shoplithing incident that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November 3, 2016, was Ill-ction Day. Would you agree with me that the shoplithing incident that took place on Friday, November 11, 2016, okay?  A Again, I'd have to look at the dates, but that seems plausible.  D. O | 10   |
| 10 Q. As an editor, would you have 11:16:24 11 conversations with people on the telephone to gather information about potential news stories? 13 A. Yes. 14 Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42 information for potential news articles? 15 and invite them to e-mail you in order to gather 11:16:42 information for potential news articles? 16 information for potential news articles? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection as I had the last time you asked this same 11:17:02 20 question, which it goes to the editorial process and his news gathering. It's protected by the You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First and Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So I will represent to you that Tuesday, November 8, 2016, was Election Day. Would you agree with me? 11:19:25 10 Co Ray. And cutting to the chase here, would you agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, would you agree with me that the shoplifting incident that occurred in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 Molnar Reporting Services, LLC (440) 340-6161  Page 47  A. Fine.  Q. Okay. Do you know whether there were demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016, okay?  A. A spain, I'd have to look at the dates, but that seems plausible.  Q. Okay. Do you know if there were 11:21 demonstrations that cocurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 2, 2006, okay. So I want to turn your attention now to the events that took plac | 10   |
| 11 conversations with people on the telephone to 12 gather information about potential news stories? 13 A. Yes. 14 Q. As an editor, would you e-mail people 15 and invite them to e-mail you in order to gather 11:16:42 16 information for potential news articles? 17 A. Yes. 18 Q. Okay, Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection 20 as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 26 Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again 11:19:07 6 to November 20:16, okay? 7 A. Fine. 6 Q. So I will represent to you that Tuesday, 9 November 8, 20:16, was Election Day. Would you agree with me? 11:19:25 10 A. Yes, sir. 11 November 9, 20:16. Do you — 12 A. I believe it was a citually eventually railed a robbery, was it not? 20 Well, let me just ask the question here. So let's turn to Wednesday, November 9, 11:20:54 16 Q. Well, let me just ask the question here. So let's turn to Wednesday, November 9, 11:20:54 16 Q. Well, let me just ask the question here. So let's turn to Wednesday, November 9, 11:20:54 16 Q. Well, let me just ask the question here. So let's turn to Wednesday, November 9, 20:16? A. Again, 1'd have to look at the police report, but that occurred at Gibson's Bakery on the 11:21 Molnar Reporting Services, LLC (440) 340-6161  Page 47  Page 47  A. Fine. Q. So let's turn again 1:19:07 So le | 10   |
| gather information about potential news stories?  A. Yes, Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42 information for potential news articles? A. Yes, Q. Okay. Did Mr. Rarric ever e-mail you? MR. KESLAR: Objection. Same objection as I had the last time you asked this same 11:17:02 and his news gathering. It's protected by the question, which it goes to the editorial process and his news gathering. It's protected by the You don't have to answer that question.  Page 47  MR. KESLAR: Same objection constitution. Q. Did you ever e-mail Mr. Rarric? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First Amendment of the U.S. Constitution. Q. Did you do not have to answer that question. Q. Did you do not have to answer that question. Q. So let's turn to Wednesday, November 9, 211:20:54 ashplifting incident that occurred at Gibson's Bakery on Wednesday, November 10th, 11:21 ashpublished. First Amendment of the U.S. Constitution.  Page 47  Page 47  A. Stre. Q. Would you agree with me that there was a shoplifting incident that occurred at Gibson's Bakery on Wednesday, November 10th, 20 (20 (a. a. a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 19   |
| 13 ruled a robbery, was it not? 14 Q. As an editor, would you e-mail people 15 and invite them to e-mail you in order to gather 11:16:42 16 information for potential news articles? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection 20 as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 26 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn to Wednesday, November 9, 11:20:54 1 A. Sure. 2 Q. Okay, November 9, 11:20:54 2 Q. Okay, November 9, 11:20:54 2 A. Sure. 2 Q. Okay, November 9, 11:20:54 3 About you agree with me that there was a shoplifting incident that occurred at Gibson's Bakery on Wednesday, November 9, 2016? II:21 4 A. Sure. 2 Q. Okay, November 9, 11:20:54 4 A. Sure. 2 Q. Okay, November 9, 11:20:54 4 A. Sure. 2 Q. Okay, November 9, 11:20:54 4 A. Sure. 2 Q. Okay, November 9, 11:20:54 5 Bakery on Wednesday, November 9, 11:20:54 6 Gibson's Bakery on Wednesday, November 10:21 6 In mext day, which would be Thursday, November 10th, 20:21 6 Gibson's Bakery and around Gibson's Bakery on Friday, November 20:16, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 8, 20:16, was Election Day. Would you agree with me? 11:19:25 10 Q. Okay. And cutting to the chase here, 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplithing incident that occurred in front of Gibson's Bakery and around Gibso |      |
| Q. As an editor, would you e-mail people and invite them to e-mail you in order to gather 11:16:42   15   So let's turn to Wednesday, November 9, 11:20:54   16   information for potential news articles?   16   2016, okay?   17   A. Sure.   18   Q. Would you agree with me that there was a sure.   18   Q. Would you agree with me that there was a sure of the editorial process and his news gathering. It's protected by the goal his news gathering. It's protected by the You don't have to answer that question.   24   You don't have to answer that question.   25   Q. Did you ever e-mail Mr. Rarric?   11:17:15   Molnar Reporting Services, LLC (440) 340-6161   Page 47   Page 47   Page 47   Page 47   MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First   2   2016?   A. Again, I'd have to look at the dates, but that seems plausible.   2016?   A. Again, I'd have to look at the dates, but that seems plausible.   2016?   A. Again, I'd have to look at the dates, but that seems plausible.   Q. Okay. Do you know if there were 11:21   to November 2016, okay?   A. Fine.   A. Yes, sir.   10   Q. Okay. And cutting to the chase here,   11:19:25   10   Q. Okay. And cutting to the chase here,   12   Q. Okay. And cutting to the chase here,   12   Q. Okay. November 9, 2016?   11:19:40   November 11:20.   A. Again, I'd have to look at the dates,   but that seems plausible.   11:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:20.   12:   |      |
| and invite them to e-mail you in order to gather 11:16:42 15 So let's turn to Wednesday, November 9, 11:20:54 information for potential news articles?  A Yes. 17 A. Sure.  Q. Okay. Did Mr. Rarric ever e-mail you? MR. KESLAR: Objection. Same objection as I had the last time you asked this same 11:17:02 20 Bakery on Wednesday, November 9, 2016? 11:21 question, which it goes to the editorial process and his news gathering. It's protected by the 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161 Page 47  MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 2 2016? 3 Amendment of the U.S. Constitution. 3 A Again, I'd have to look at the police report, but that sounds like a plausible date. 20 Okay. Do you know whether there were demonstrations that took place in front of dibson's Bakery and around Gibson's Bakery on the 11:21 Molnar Reporting Services, LLC (440) 340-6161 Page 47  MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 2 2016? Amendment of the U.S. Constitution. 3 A Again, I'd have to look at the dates, but that seems plausible. 4 You don't have to answer that question. 4 You don't have to answer that question. 5 Q. So let's turn again — let's tu |      |
| 16 information for potential news articles? 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR, KESLAR: Objection. Same objection 20 as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process 21 and his news gathering. It's protected by the 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it 20 goes to his reporting. It's unpublished. First 20 goes to his reporting. It's unpublished. First 20 G. So let's turn again – let's turn again 11:19:07  6 to November 2016, okay? 7 A. Sure. 1 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |      |
| 17 A. Yes. 18 Q. Okay. Did Mr. Rarric ever e-mail you? 19 MR. KESLAR: Objection. Same objection 20 as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 26 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 4 You don't have to answer that question. 5 Q. So let's turn again – let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:17:102 12 A. Again, I'd have to look at the police report, but that sounds like a plausible date. 20 Chay. Do you know whether there were 21 demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 next day, which would be Thursday, November 10th, 2016? 2 A. Again, I'd have to look at the dates, but that seems plausible. 2 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. 4 Q. Okay. Do you know if there were 11:21 demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016?  A. Assuming that they started on Thursday, yes, they did continue for more than one day. 11:20 Q. Okay. And cutting to the chase here, 12 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay? 14 A. Yes, sir. 15 on Wednesday, November 9, 2016? 11:19:40  17 A. Yes, sir. 18 Q. Okay and lot finy questions that I'm going 11:22  18 Q. And all of my questions that I'm going 11:22                                                                                             |      |
| 18 Q. Okay. Did Mr. Rarric ever e-mail you?  MR. KESLAR: Objection. Same objection 20 as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 11:17:15 26 Molnar Reporting Services, LLC (440) 340-6161  Page 47  1 MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again – let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 2016, was Election Day. Would you 20 Would you agree with me that there was a shoplifting incident that occurred at Gibson's 1:21 A. Again, I'd have to look at the police report, but that sounds like a plausible date. 22 Q. Okay. Do you know whether there were demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 Molnar Reporting Services, LLC (440) 340-6161  Page 47  Page 47  Page 47  Page 47  A. Again, I'd have to look at the police report, but that sounds like a plausible date. 23 Q. Okay. Do you know whether there were demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery on Friday, November 10th, 2016?  A. Again, I'd have to look at the police report, but that sounds like a plausible date. 24 Q. Okay. Do you know whether there were demonstrations that otok place in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016?  A. Again, I'd have to look at the police report, but that sounds like a plausible date. 25 Q. Okay. Do you know whether there were demonstrations that otok place in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016?  A. Assuming that they started on Thursday, yes, they did continue for more than one day. 11:21 Q. Okay. So |      |
| MR. KESLAR: Objection. Same objection as I had the last time you asked this same 11:17:02 11 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarrie? 26 Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it 27 goes to his reporting. It's unpublished. First 28 Amendment of the U.S. Constitution. 29 Q. So let's turn again — let's turn again 11:19:07 20 Q. So let's turn again — let's turn again 11:19:07 21 A. Fine. 22 Good and his news that question. 23 Q. Okay. Do you know whether there were demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 demonstrations that olocy at the dates, but that seems plausible. 30 A. Again, I'd have to look at the dates, but that seems plausible. 41 Demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November 10:10, okay? 42 A goes to his reporting. It's unpublished. First 12 20:16? 43 Amendment of the U.S. Constitution. 44 You don't have to answer that question. 55 Q. So let's turn again 11:19:07 56 to November 20:16, okay? 57 A. Fine. 58 A. Fine. 59 A. Fine. 50 A. Again, I'd have to look at the dates, but that seems plausible. 50 Cokay. Do you know whether the dates, but that seems plausible. 50 A. Again, I'd have to look at the dates, but that seems plausible. 51 A. Again, I'd have to look at the date, 11:21 demonstrations that occurred in front of Gibson's Bakery on Friday, November 10:10, okay? 51 A. Fine. 52 Bakery and around Gibson's Bakery on Friday, 11:21 demonstrations that occurred in front of Gibson's Bakery on Friday, 11:21 demonstrations that occurred in front of Gibson's Bakery on Friday, 11:21 demonstration that occurred in front of Gibson's Bakery on Friday, 11:21 demonstration on the total plausible of the constration of Gibson's Bakery on Friday, 11:22 demonstration have to |      |
| as I had the last time you asked this same 11:17:02 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 26 Molnar Reporting Services, LLC (440) 340-6161  Page 47  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First protection because it to November 10:05. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, November 11:29:5 9 November 8, 2016, was Election Day. Would you agree with me? 11:21:20  Bakery on Wednesday, November 9, 2016? 11:21 A. Again, I'd have to look at the police report, but that sounds like a plausible date. 22 Q. Okay. Do you know whether there were demonstrations that took place in front of 25 Gibson's Bakery and around Gibson's Bakery on the 11:21 Molnar Reporting Services, LLC (440) 340-6161  Page 47  Page 47  Page 47  Page 47  Inext day, which would be Thursday, November 10th, 2016? 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. 4 but that seems plausible. 6 Q. Okay. Do you know if there were 11:21 6 demonstrations that occurred in front of Gibson's Bakery on Friday, November 8, 2016, was Election Day. Would you agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 11:21  20 And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                    |      |
| 21 question, which it goes to the editorial process 22 and his news gathering. It's protected by the 23 First Amendment of the U.S. Constitution. 24 You don't have to answer that question. 25 Q. Did you ever e-mail Mr. Rarric? 26 Molnar Reporting Services, LLC (440) 340-6161  27 Page 47  1 MR. KESLAR: Same objection because it 28 goes to his reporting. It's unpublished. First 29 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — l |      |
| and his news gathering. It's protected by the First Amendment of the U.S. Constitution.  Q. Did you ever e-mail Mr. Rarrie? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First Amendment of the U.S. Constitution.  You don't have to answer that question.  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First Amendment of the U.S. Constitution.  You don't have to answer that question.  You don't have to answer that question.  A. Again, I'd have to look at the dates, but that seems plausible.  D. Okay. Do you know if there were demonstrations that own place in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 A. Fine.  Q. So let's turn again — let's turn again 11:19:07  A. Fine.  Q. So I will represent to you that Tuesday, November 8, 2016, was Election Day. Would you agree with me?  11:19:25  A. Assuming that they started on Thursday, yes, they did continue for more than one day. 11:2 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay?  A. Yes, sir.  D. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay?  A. Yes, sir.  D. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay?  A. Yes, sir.  D. Okay. And all of my questions that I'm going 11:22  On Wednesday, November 9, 2016?  Page 47  Page 48 | :05  |
| First Amendment of the U.S. Constitution.  24 You don't have to answer that question.  25 Q. Did you ever e-mail Mr. Rarrie? 11:17:15 Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First 2 2016?  Amendment of the U.S. Constitution.  You don't have to answer that question.  Q. So let's turn again — let's turn again 11:19:07  A. Fine.  Q. So I will represent to you that Tuesday, November 8, 2016, was Election Day. Would you agree with me? 11:19:25  A. Yes, sir.  Q. Okay. Do you know whether there were demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 mext day, which would be Thursday, November 10th, 2016?  A. Again, I'd have to look at the dates, but that seems plausible.  Q. Okay. Do you know whether there were demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November 11:21 demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November 11:19:25  A. Yes, sir.  10 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay?  A. Yes, sir.  11 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay?  A. Yes, sir.  15 on Wednesday, November 9, 2016?  11:19:40  12 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |      |
| You don't have to answer that question.  Q. Did you ever e-mail Mr. Rarrie?  All:17:15  Molnar Reporting Services, LLC  (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First Amendment of the U.S. Constitution. You don't have to answer that question. Q. So let's turn again — let's turn again 11:19:07  A Fine. Q. So I will represent to you that Tuesday, November 8, 2016, was Election Day. Would you agree with me? A. Yes, sir. Q. Okay. And cutting to the chase here, Q. Okay. And cutting to the chase here, Incident about which you have written took place I goes to his reporting. It's unpublished. First Q. Okay. And all of my questions that took place in front of Gibson's Bakery and around Gibson's Bakery on the 11:21 A. Yes, sir.  demonstrations that took place in front of Gibson's Bakery and around Gibson's Bakery and around Gibson's Bakery and around Gibson's House to look at the dates, but that seems plausible. Q. Okay. Do you know if there were 11:21 demonstrations that took place in front of Gibson's Bakery and around Gibson's B |      |
| Q. Did you ever e-mail Mr. Rarric? Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First 2 2016?  Amendment of the U.S. Constitution. 3 A. Again, I'd have to look at the dates, but that seems plausible. 4 but that seems plausible. 5 Q. So let's turn again — let's turn again — 11:19:07  to November 2016, okay? 6 demonstrations that occurred in front of Gibson's Bakery on Friday, November 8, 2016, was Election Day. Would you agree with me? 11:19:25  1 A. Yes, sir. 10 Q. Okay. And cutting to the chase here, would you agree with me that the shoplifting incident about which you have written took place on Wednesday, November 9, 2016? 11:19:40  Page 47  Page 47  Page 47  I next day, which would be Thursday, November 10th, 2016?  A. Again, I'd have to look at the dates, but that seems plausible. 5 Q. Okay. Do you know if there were 11:21 demonstrations that occurred in front of Gibson's Bakery on Friday, November, 11, 2016?  A. Assuming that they started on Thursday, yes, they did continue for more than one day. 11:2016; okay? 11:19:40  A. Yes, sir. 12  Q. Okay. And cutting to the chase here, 11:19:40  A. Yes, sir. 15  Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |      |
| Molnar Reporting Services, LLC (440) 340-6161  Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First 2 2016?  Amendment of the U.S. Constitution. 3 A. Again, I'd have to look at the dates, You don't have to answer that question. 4 but that seems plausible. 5 Q. So let's turn again let's turn again 11:19:07 5 Q. Okay. Do you know if there were 11:21 6 to November 2016, okay? 6 demonstrations that occurred in front of Gibson's Pakery and around Gibson's Bakery on Friday, November 8, 2016, was Election Day. Would you agree with me? 11:19:25 10 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay? 1. A. Yes, sir. 15 on Wednesday, November 9, 2016? 11:19:40 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |
| Page 47  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First Amendment of the U.S. Constitution.  Output  Description  MR. KESLAR: Same objection because it goes to his reporting. It's unpublished. First Amendment of the U.S. Constitution.  Amendment of the U.S. Constitution.  Output  Description  Output  Description  Des | .:23 |
| 1 MR. KESLAR: Same objection because it 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sit. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 11:19:40 11 next day, which would be Thursday, November 10th, 2 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. Q. Okay. Do you know if there were 11:21 demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016? A. Assuming that they started on Thursday, yes, they did continue for more than one day. 11:2 11 Q. Okay. So I want to turn your attention 12 Q. Okay. So I want to turn your attention 13 November 11, 2016, okay? 14 incident about which you have written took place 14 A. Yes, sir. 15 on Wednesday, November 9, 2016? 11:19:40 16 next day, which would be Thursday, November 10th, 2 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. Q. Okay. Do you know if there were 11:21 demonstrations that occurred in front of Gibson's Bakery and around Gibson's Bakery on Friday, November, 11, 2016?  A. Assuming that they started on Thursday, yes, they did continue for more than one day. 11:2 11:20 November 11, 2016, okay? 12 A. Yes, sir. 13 November 11, 2016, okay? 14 A. Yes, sir. 15 O. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                              |      |
| 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 Q. And all of my questions that I'm going 11:22 11:19:40 12 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. 9 Q. Okay. Do you know if there were 11:21 6 demonstrations that occurred in front of Gibson's 11:21 11:21 12:21 13 A. Fine. 9 Rakery and around Gibson's Bakery on Friday, 8 November, 11, 2016? 9 A. Assuming that they started on Thursday, 10 yes, they did continue for more than one day. 11:2 11:22 Q. Okay. So I want to turn your attention 12 Q. Okay. So I want to turn your attention 13 November 11, 2016, okay? 14 A. Yes, sir. 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | e 49 |
| 2 goes to his reporting. It's unpublished. First 3 Amendment of the U.S. Constitution. 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 11:19:40 2 2016? 3 A. Again, I'd have to look at the dates, but that seems plausible. 9 Q. Okay. Do you know if there were 11:21 6 demonstrations that occurred in front of Gibson's 11:21 7 Bakery and around Gibson's Bakery on Friday, 8 November, 11, 2016? 9 A. Assuming that they started on Thursday, 10 yes, they did continue for more than one day. 11:2 11 Q. Okay. So I want to turn your attention 12 Q. Okay. So I want to turn your attention 13 November 11, 2016, okay? 14 A. Yes, sir. 15 on Wednesday, November 9, 2016? 11:19:40 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |      |
| A Again, I'd have to look at the dates, You don't have to answer that question.  Q. So let's turn again — let's turn again 11:19:07  to November 2016, okay?  A. Fine.  Q. So I will represent to you that Tuesday,  November 8, 2016, was Election Day. Would you  agree with me?  11:19:25  A. Yes, sir.  Q. Okay. Do you know if there were 11:21  demonstrations that occurred in front of Gibson's Bakery on Friday,  November, 11, 2016?  A. Assuming that they started on Thursday,  yes, they did continue for more than one day. 11:2  Q. Okay. So I want to turn your attention  Q. Okay. So I want to turn your attention  now to the events that took place on Friday,  November 11, 2016, okay?  A. Yes, sir.  O. Wednesday, November 9, 2016?  11:19:40  A. Yes, sir.  Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |      |
| 4 You don't have to answer that question. 5 Q. So let's turn again — let's turn again 11:19:07 6 to November 2016, okay? 7 A. Fine. 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. Do you know if there were 11:21 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 11:19:40  4 but that seems plausible. Q. Okay. Do you know if there were 11:21 12 Q. Okay. Do you know if there were 11:21 13 but that seems plausible. Q. Okay. Do you know if there were 11:21 14 demonstrations that occurred in front of Gibson's Bakery on Friday, November, 11, 2016? 11:19:40  5 Q. Okay. Do you know if there were 11:21 12 Q. Okay. Do you know if there were 11:21 13 but that seems plausible. Q. Okay. Do you know if there were 11:21 14 demonstrations that cocurred in front of Gibson's Bakery on Friday, November, 11, 2016? 11:21 12 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay? 14 A. Yes, sir. 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |
| 5 Q. So let's turn again — let's turn again 11:19:07 5 Q. Okay. Do you know if there were 11:21 6 to November 2016, okay? 6 demonstrations that occurred in front of Gibson's Pakery and around Gibson's Bakery on Friday, 8 Q. So I will represent to you that Tuesday, 9 November 8, 2016, was Election Day. Would you 9 A. Assuming that they started on Thursday, 10 agree with me? 11:19:25 10 yes, they did continue for more than one day. 11:2 11 A. Yes, sir. 11 Q. Okay. So I want to turn your attention 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 13 November 11, 2016, okay? 14 incident about which you have written took place 14 A. Yes, sir. 15 on Wednesday, November 9, 2016? 11:19:40 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |      |
| to November 2016, okay?  A. Fine.  Q. So I will represent to you that Tuesday,  November 8, 2016, was Election Day. Would you  agree with me?  11:19:25  10 yes, they did continue for more than one day.  A. Yes, sir.  Q. Okay. And cutting to the chase here,  would you agree with me that the shoplifting  incident about which you have written took place  to November 2016, okay?  Rakery and around Gibson's Bakery on Friday,  November, 11, 2016?  A. Assuming that they started on Thursday,  yes, they did continue for more than one day.  11:2  Q. Okay. So I want to turn your attention  now to the events that took place on Friday,  November 11, 2016, okay?  A. Yes, sir.  On Wednesday, November 9, 2016?  11:19:40  15  Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | :34  |
| 8 November, 11, 2016? 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 18 November, 11, 2016? 9 A. Assuming that they started on Thursday, 10 yes, they did continue for more than one day. 11:2 11 Q. Okay. So I want to turn your attention 12 now to the events that took place on Friday, 13 November 11, 2016, okay? 14 A. Yes, sir. 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |      |
| 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 19 A. Assuming that they started on Thursday, 10 yes, they did continue for more than one day. 11:12 10 Q. Okay. So I want to turn your attention 11 now to the events that took place on Friday, 12 November 11, 2016, okay? 13 November 11, 2016, okay? 14 A. Yes, sir. 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |
| 9 November 8, 2016, was Election Day. Would you 10 agree with me? 11:19:25 11 A. Yes, sir. 12 Q. Okay. And cutting to the chase here, 13 would you agree with me that the shoplifting 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 11:19:40 9 A. Assuming that they started on Thursday, 10 yes, they did continue for more than one day. 11:2 11 Q. Okay. So I want to turn your attention 12 now to the events that took place on Friday, 13 November 11, 2016, okay? 14 A. Yes, sir. 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |      |
| A. Yes, sir.  Q. Okay. And cutting to the chase here, would you agree with me that the shoplifting incident about which you have written took place incident about which you have written took place on Wednesday, November 9, 2016?  11 Q. Okay. So I want to turn your attention now to the events that took place on Friday, November 11, 2016, okay? A. Yes, sir.  15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |
| 12Q. Okay. And cutting to the chase here,12now to the events that took place on Friday,13would you agree with me that the shoplifting13November 11, 2016, okay?14incident about which you have written took place14A. Yes, sir.15on Wednesday, November 9, 2016?11:19:4015Q. And all of my questions that I'm going11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1:51 |
| would you agree with me that the shoplifting 13 November 11, 2016, okay? 14 incident about which you have written took place 15 on Wednesday, November 9, 2016? 11:19:40 13 November 11, 2016, okay? 14 A. Yes, sir. 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |      |
| <ul> <li>incident about which you have written took place</li> <li>on Wednesday, November 9, 2016?</li> <li>11:19:40</li> <li>Q. And all of my questions that I'm going</li> <li>11:22</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |      |
| on Wednesday, November 9, 2016? 11:19:40 15 Q. And all of my questions that I'm going 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |      |
| 16 A. I'd have to look at the police report 16 to ask you now relate to what occurred on Friday.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | :08  |
| e e e                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |      |
| again to be sure, but it sounds plausible. 17 November 11, 2016. Can we agree to that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |      |
| 18 Q. Okay. You are aware that there were 18 A. Sir. Sure. Sorry, my throat is dry.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |      |
| demonstrations that occurred in Oberlin and 19 Q. By the way, the other agreement that we                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |      |
| 20 around the Oberlin campus on Thursday, November 11:19:59 20 didn't talk about is if you need to take a break 11:22:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |      |
| 21 10th, correct? 21 at any time, we can do that, or if you need to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 28   |
| A. Again, I'd have to refresh my memory  22 step away for any reason at all, you can do that,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | :28  |
| 23 about exactly what the date was. 23 so long as a question is not pending.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | :28  |
| 24 Q. Okay. 24 A. I might request a restroom break soon.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | :28  |
| 25 A. Also, I'm not entirely sure about around 11:20:14 25 Q. Good, Let's take a break now. Does 11:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |      |
| Molnar Reporting Services, LLC (440) 340-6161 Molnar Reporting Services, LLC (440) 340-6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | :45  |

| 1                                                                                | Page 50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                       | Page 52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                | that sound good?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1                                                                                     | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2                                                                                | A. If that's okay with you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2                                                                                     | Q. Okay. And it was on your drive to work                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3                                                                                | MR. HOLMAN: Of course. Of course.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 3                                                                                     | on Friday, November 11th, that you noticed that                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4                                                                                | We're off the record.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 4                                                                                     | there were demonstrations occurring?                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5                                                                                | VIDEOGRAPHER: Off the record, 11:22. 11:22:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 5                                                                                     | A. To the best of my recollection, yes. 11:39:50                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6                                                                                | (Recess taken.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 6                                                                                     | Q. About what time were you driving to work                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 7                                                                                | VIDEOGRAPHER: On the record, 11:36.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 7                                                                                     | when you saw the demonstrations on West College                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 8                                                                                | Q. So we're back on the record. You've had                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | В                                                                                     | Street?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 9                                                                                | a break, you've had some water, right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 9                                                                                     | A. That would be pure speculation.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10                                                                               | A. Thank you, 11:37:29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 10                                                                                    | Q. Was it in the afternoon? 11:40:08                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11                                                                               | Q. Good. You're welcome. And again, we                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 11                                                                                    | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12                                                                               | can take a break whenever you would like to take                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 12                                                                                    | Q. Okay. It was sometime in the morning?                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 13                                                                               | a break, okay?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 13                                                                                    | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 14                                                                               | A. I appreciate that,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 14                                                                                    | <ul> <li>Q. Okay. Can you estimate for me about</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 15                                                                               | Q. Sure. So let's turn to Friday, November 11:37:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 15                                                                                    | what time in the morning? 11:40:24                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 16                                                                               | 11, 2016, and I will represent to you that that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 16                                                                                    | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 17                                                                               | date was a Friday.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 17                                                                                    | Q. Okay. About what time do you typically                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 18                                                                               | Did you somehow become aware that there                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 18                                                                                    | go to work?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 19<br>20                                                                         | were demonstrations taking place or going to take place in front of or around Gibson's Bakery on 11:37:56                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 19                                                                                    | A. I typically go to work between eight and                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 21                                                                               | that date?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 20                                                                                    | nine o'clock. 11:40:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 22                                                                               | A. Didn't the demonstrations start the day                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 22                                                                                    | Q. Okay. Would you estimate for me that                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 23                                                                               | prior?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 23                                                                                    | you were driving past West College Street between 8:00 and 9:00 a.m. that morning?                                                                                                                                                                                                                                                                                                                                                                                                               |
| 24                                                                               | Q. That's correct, yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 24                                                                                    | A. It's very hard to say. My schedule does                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 25                                                                               | A. Okay. 11:38:07                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 25                                                                                    | fluctuate. 11:40:53                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| -                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | ~~                                                                                    | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                  | Page 51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                       | Page 53                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1                                                                                | Q. So your answer is yes?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                     | Q. Okay. So you were driving to work,                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2                                                                                | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2                                                                                     | correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3                                                                                | Q. Okay. So to be clear, so you became                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3                                                                                     | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 4                                                                                | aware at some point that there would be                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4                                                                                     | Q. You were by yourself?                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5                                                                                | demonstrations in front of Gibson's Bakery and 11:38:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 5                                                                                     | A. Correct. 11:40:59                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 6                                                                                | around the bakery on Friday, November 11, 2016,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 6                                                                                     | Q. And what street were you on when you                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7                                                                                | correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 7                                                                                     | first noticed that there were demonstrations                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8<br>9                                                                           | A. Well, I didn't have pre-knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 8                                                                                     | occurring on November 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | l l                                                                                   | <del>_</del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| _                                                                                | Q. Okay. But at some point you learned, so                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9                                                                                     | A. I don't remember.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10                                                                               | at some point on November 11th, you learned that 11:38:29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9<br>10                                                                               | A. I don't remember.     Q. So we're clear, as you were driving to 11:41:19                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10<br>11                                                                         | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 9<br>10<br>11                                                                         | A. I don't remember.     Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring                                                                                                                                                                                                                                                                                                                                                                      |
| 10<br>11<br>12                                                                   | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9<br>10<br>11<br>12                                                                   | A. I don't remember.     Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street?                                                                                                                                                                                                                                                                                                                                              |
| 10<br>11<br>12<br>13                                                             | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes.                                                                                                                                                                                                                                                                                                                                                                                          | 9<br>10<br>11<br>12<br>13                                                             | A. I don't remember.     Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street?     A. Yes.                                                                                                                                                                                                                                                                                                                                  |
| 10<br>11<br>12<br>13<br>14                                                       | at some point on November 11th, you learned that demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes.  Q. Okay. When did you first learn that?                                                                                                                                                                                                                                                                                                                                                          | 9<br>10<br>11<br>12<br>13<br>14                                                       | <ul> <li>A. I don't remember.</li> <li>Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street?</li> <li>A. Yes.</li> <li>Q. Okay. But you don't recall what street</li> </ul>                                                                                                                                                                                                                                                 |
| 10<br>11<br>12<br>13<br>14<br>15                                                 | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43                                                                                                                                                                                                                                                                                                | 9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32                                                                                                                                                                                                                                             |
| 10<br>11<br>12<br>13<br>14<br>15                                                 | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the                                                                                                                                                                                                                                                       | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations?                                                                                                                                                                                                                             |
| 10<br>11<br>12<br>13<br>14<br>15                                                 | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11?                                                                                                                                                                                                                        | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work                                                                                                                                                                                          |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window.                                                                                                                                                                                   | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100                                                                                                                                               |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window. Q. Does your drive from home to work take                                                                                                                                         | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100 percent certainty.                                                                                                                            |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window. Q. Does your drive from home to work take                                                                                                                                         | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100 percent certainty. Q. So on the morning of November 11, you 11:41:48                                                                          |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window. Q. Does your drive from home to work take you past Oberlin's campus? 11:39:03 A. It's hard to say. Some – the campus                                                              | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100 percent certainty. Q. So on the morning of November 11, you 11:41:48 saw demonstrations taking place on West College                          |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window. Q. Does your drive from home to work take you past Oberlin's campus? 11:39:03                                                                                                     | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100 percent certainty. Q. So on the morning of November 11, you 11:41:48                                                                          |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window. Q. Does your drive from home to work take you past Oberlin's campus? 11:39:03 A. It's hard to say. Some — the campus owns a lot of the land. It takes me down Route               | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100 percent certainty. Q. So on the morning of November 11, you 11:41:48 saw demonstrations taking place on West College Street, correct?         |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | at some point on November 11th, you learned that 11:38:29 demonstrations were actually occurring in and around Gibson's Bakery?  A. That they were continuing, sure. Yes. Q. Okay. When did you first learn that? A. I believe it was on my drive to work. 11:38:43 Q. Okay. How did you become aware of the demonstrations on November 11? A. I saw them out of the car window. Q. Does your drive from home to work take you past Oberlin's campus? 11:39:03 A. It's hard to say. Some — the campus owns a lot of the land. It takes me down Route 58 most days. | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | A. I don't remember. Q. So we're clear, as you were driving to 11:41:19 work, you actually saw demonstrations occurring on West College Street? A. Yes. Q. Okay. But you don't recall what street you were on when you first observed those 11:41:32 demonstrations? A. I take different routes to work sometimes. It's impossible to say with 100 percent certainty. Q. So on the morning of November 11, you 11:41:48 saw demonstrations taking place on West College Street, correct? A. Yes. |

|                                                                                  | <del></del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                  | Page 54                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                  | Page 56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1                                                                                | morning?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                | wanted to point out, you've mentioned a row of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2                                                                                | A. I arrived at work.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2                                                                                | historical buildings. Are those buildings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3                                                                                | Q. Okay. Where is the newspaper located?                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3                                                                                | represented by the buildings in the direction of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4                                                                                | A. 42 South Main Street in Oberlin.                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 4                                                                                | the arrow for Number 1 there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5                                                                                | Q. Can you draw a map that shows generally 11:42:22                                                                                                                                                                                                                                                                                                                                                                                                                                     | 5                                                                                | A. I'm sorry? 11:45:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 6                                                                                | speaking where West College Street is in relation                                                                                                                                                                                                                                                                                                                                                                                                                                       | 6                                                                                | Q. Okay. Do you see the Number 1 here?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 7                                                                                | to the street where your newspaper is located?                                                                                                                                                                                                                                                                                                                                                                                                                                          | 7                                                                                | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8                                                                                | A. I believe I could, yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 8                                                                                | Q. Are these the historic buildings that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 9                                                                                | Q. Okay. I'm going to give you a piece of                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9                                                                                | you were referencing?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10                                                                               | paper. We're going to mark this as Exhibit - 11:42:40                                                                                                                                                                                                                                                                                                                                                                                                                                   | 10                                                                               | A. Yes, these crude squares here are the 11:45:33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 11                                                                               | MS, CROCKER: 3.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 11                                                                               | row of historic buildings, as are these that go                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 12                                                                               | Q. Three, If you could just draw a general                                                                                                                                                                                                                                                                                                                                                                                                                                              | 12                                                                               | west on West College.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13                                                                               | diagram of West College Street in relation to the                                                                                                                                                                                                                                                                                                                                                                                                                                       | 13                                                                               | Q. Oh, okay. So the historic buildings are                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 14                                                                               | street where your newspaper is located, that                                                                                                                                                                                                                                                                                                                                                                                                                                            | 14                                                                               | those that are reflected in the direction of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 15                                                                               | would be helpful. 11:42:59                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 15                                                                               | one and the two that I've made? 11:45:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 16                                                                               | A. Stipulating that it's not to scale?                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 16                                                                               | A. Correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 17                                                                               | Q. Yes, we can stipulate that it's not to                                                                                                                                                                                                                                                                                                                                                                                                                                               | 17                                                                               | Q. Okay. Can you identify with an X,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 18                                                                               | scale. We can also stipulate that you're not an                                                                                                                                                                                                                                                                                                                                                                                                                                         | 18                                                                               | again, not to scale and not to perfection, where                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 19                                                                               | artist, unless you are an artist.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 19                                                                               | Gibson's Bakery is located?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 20                                                                               | A. Okay. 11:43:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 20                                                                               | A. It's roughly located here. 11:45:56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 21                                                                               | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 21                                                                               | Q. Okay. So the X marks the spot of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 22                                                                               | A. Again, stipulating that the buildings                                                                                                                                                                                                                                                                                                                                                                                                                                                | 22                                                                               | Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 23                                                                               | are merely representations, that I'm not actually                                                                                                                                                                                                                                                                                                                                                                                                                                       | 23                                                                               | MR. KESLAR: And I would just note that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 24                                                                               | counting out the numbers of buildings, that I'm                                                                                                                                                                                                                                                                                                                                                                                                                                         | 24                                                                               | there looks like an X there already.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 25                                                                               | just drawing them, but — 11:44:23                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 25                                                                               | A. I did place an X here. We can make it 11:46:08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.5                                                                              | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                           | -                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                  | (viv) 510-0101                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | ]                                                                                | (470) 340 010x                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                  | Page 55                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                  | Page 57                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1                                                                                | Q. I can agree with that.                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1                                                                                | an O for Oberlin News Tribune if you'd like.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2                                                                                | A. You said a rough map and there is a very                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2                                                                                | Q. Okay. That's helpful. So the O on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3                                                                                | rough map, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 3                                                                                | Exhibit A, Exhibit 3 – strike that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4                                                                                | Q. Well, that's - I appreciate it.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 4                                                                                | So O on Exhibit 3 reflects where the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5                                                                                | So you have just made some markings on 11:44:33                                                                                                                                                                                                                                                                                                                                                                                                                                         | 5                                                                                | Oberlin – 11:46:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6                                                                                | Exhibit 3, and maybe you can describe what you                                                                                                                                                                                                                                                                                                                                                                                                                                          | 6                                                                                | MR. KESLAR: News Tribune.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 7                                                                                | have drawn for us this morning.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7                                                                                | Q. — News Tribune is located, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 8                                                                                | ,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 8                                                                                | A. That's correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9                                                                                | (Thereupon, Hawk Deposition Exhibit 3 was marked                                                                                                                                                                                                                                                                                                                                                                                                                                        | 9                                                                                | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 10                                                                               | for purposes of identification.) 11:44:39                                                                                                                                                                                                                                                                                                                                                                                                                                               | 10                                                                               | A. And also, I've drawn a little thing 11:46:29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | í                                                                                | here's that's Tappan Square                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 11                                                                               | here's that's Tappan Square.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 11<br>12                                                                         | A. College Street and Route 58 are                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 11<br>12                                                                         | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 11<br>12<br>13                                                                   | A. College Street and Route 58 are crossroads that happen roughly in the center of                                                                                                                                                                                                                                                                                                                                                                                                      | 11<br>12<br>13                                                                   | <ul><li>Q. Okay.</li><li>A. Again, not to – not to scale.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 11<br>12<br>13<br>14                                                             | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This                                                                                                                                                                                                                                                                                                                                                     | 11<br>12<br>13<br>14                                                             | <ul><li>Q. Okay.</li><li>A. Again, not to - not to scale.</li><li>Q. Sure. Can you mark a T there?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 11<br>12<br>13<br>14<br>15                                                       | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48                                                                                                                                                                                                                                                                                              | 11<br>12<br>13<br>14<br>15                                                       | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                            |
| 11<br>12<br>13<br>14<br>15                                                       | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the                                                                                                                                                                                                                                            | 11<br>12<br>13<br>14<br>15<br>16                                                 | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> </ul>                                                                                                                                                                                                                                                                                                                                                 |
| 11<br>12<br>13<br>14<br>15<br>16                                                 | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.                                                                                                                                                                                                                                       | 11<br>12<br>13<br>14<br>15<br>16<br>17                                           | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> </ul>                                                                                                                                                                                                                                                                                                                            |
| 11<br>12<br>13<br>14<br>15<br>16<br>17                                           | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify                                                                                                                                                                                                 | 11<br>12<br>13<br>14<br>15<br>16<br>17                                           | <ul> <li>Q. Okay.</li> <li>A. Again, not to - not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you</li> </ul>                                                                                                                                                                                                                                                                       |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?                                                                                                                                                               | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of</li> </ul>                                                                                                                                                                                                                            |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?  A. Yes, sir. 11:44:56                                                                                                                                        | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of Friday, November 11, 2016? 11:46:48</li> </ul>                                                                                                                                                                                        |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?  A. Yes, sir. 11:44:56  Q. So, and again, I'm – I am no artist                                                                                                | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of Friday, November 11, 2016? 11:46:48</li> <li>A. There is a slim possibility that I used</li> </ul>                                                                                                                                    |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?  A. Yes, sir. 11:44:56  Q. So, and again, I'm – I am no artist either, so we're both on the same playing field                                                | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of Friday, November 11, 2016? 11:46:48</li> <li>A. There is a slim possibility that I used East College Street, but to the best of my</li> </ul>                                                                                         |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?  A. Yes, sir. 11:44:56  Q. So, and again, I'm – I am no artist either, so we're both on the same playing field here.                                          | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of Friday, November 11, 2016? 11:46:48</li> <li>A. There is a slim possibility that I used East College Street, but to the best of my recollection, yes, it was Route 58.</li> </ul>                                                     |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?  A. Yes, sir. 11:44:56  Q. So, and again, I'm – I am no artist either, so we're both on the same playing field here.  So I have just written a Number 1 and 2 | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of Friday, November 11, 2016? 11:46:48</li> <li>A. There is a slim possibility that I used East College Street, but to the best of my recollection, yes, it was Route 58.</li> <li>Q. Okay. Can you write East College Street</li> </ul> |
| 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. College Street and Route 58 are crossroads that happen roughly in the center of Oberlin in what's called the downtown area. This is a row of historical buildings. So is this, 11:44:48 although there's some new construction toward the end.  Q. Okay. And let's – just to clarify this, can I have the pen, please?  A. Yes, sir. 11:44:56  Q. So, and again, I'm – I am no artist either, so we're both on the same playing field here.                                          | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | <ul> <li>Q. Okay.</li> <li>A. Again, not to – not to scale.</li> <li>Q. Sure. Can you mark a T there?</li> <li>A. I can. 11:46:36</li> <li>Q. So T represents Tappan Square?</li> <li>A. Correct.</li> <li>Q. So is it your best recollection that you were driving on Route 58 on the morning of Friday, November 11, 2016? 11:46:48</li> <li>A. There is a slim possibility that I used East College Street, but to the best of my recollection, yes, it was Route 58.</li> </ul>                                                     |

| Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? 5 Q. I will represent that is the second day 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 10 Q. Okay. So what did you see? 11 Q. Okay. So what did you see? 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. I know you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 A. Yes. 10 A. Yes. 11:49:01 12 A. Yes. 13 A. Yes. 14 A. Again, I'm not going to speculate on how many there were. 16 Q. Okay. Well, I understand. I'm not out there? 17 asking you to speculate, but you said there were. 18 A. No. 19 Q. Okay. Were there a thousand protestors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 11:49:51                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| 2 Q. Okay. So is it your testimony that you 3 would have first seen demonstrations on West 4 College Street either while driving on Route 58 5 or East College Street? 11.47:30 6 A. Also possibly from the corner of 58 and 7 Lorain. 8 Q. Can you identify where that is on the 9 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 12 perpendicularly on the far side of Tappan Square, 13 Q. Okay. So is in your testimony that you 14 likely would have seen the demonstrations on West 15 College Street either from Route 58 or East 11:48:10 16 College Street either from Route 58 or East 11:48:10 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 11:48:33 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 11:48:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11:49:51                                        |
| would have first seen demonstrations on West College Street either while driving on Route 58 or East College Street? 11.47:30 6 A. Also possibly from the corner of 58 and Lorain. 8 Q. Can you identify where that is on the map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 22 perpendicularly on the far side of Tappan Square. 13 Q. Okay. So is it your testimony that you 14 likely would have seen the demonstrations on West 15 College Street or Lorain Street/Route 51? 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College Street. What exactly do you see? 20 Street. What exactly do you see? 21 Life. 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 3 not sure whether you checked, but that's the 4 second day of protests? 5 Q. I will represent that is the second day 11.48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 2016, okay. 9 Okay. When you adding to speculate on how man 9 and I have now agreed is Friday, November 11, 2016, okay. 11.49:01 20 Q. Okay. So is it your testimony that there 21 work. 22 Q. Can you give me any range of how man 23 protests yes. So all of my questions relate 24 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 2016, correct? 20 Q. Okay. Were there 20? 21 A. Protestors. 22 Q. Okay. So is is your testimony there were 23 Q. Okay. So is is your testimony there were 24 were some number less than I,000 protestor 25 questions relate 26 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 2016, correct? 21 A. Protestors. 22 Q. Can you give me any range of how man 23 protestors were present that morning as you were 24 driving to work? 25 Q. Can you give me any range of how man 26 protests, yes. So all of my questions relate 27 to  | 11:49:51                                        |
| College Street either while driving on Route 58 5 or East College Street? 11:47:30 6 A. Also possibly from the corner of 58 and 7 Lorain. 8 Q. Can you identify where that is on the map? 9 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 51 l intersects Route 58 12 perpendicularly on the far side of Tappan Square. 13 Q. Okay. So is it your testimony that you likely would have seen the demonstrations on West 15 College Street either from Route 58 reast 11:48:10 15 College Street either from Route 58 reast 11:48:10 16 College Street either from Route 58 reast 11:48:10 17 A. Yes, sir. 18 Q. Okay. So is it your testimony that you see demonstrations and which date? 19 Street what exactly do you see? 11:48:33 20 A. Again, on which date? 21 Q. Friday. 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? 10 A. Yes. 11:49:01 12 Q. Okay. So what did you see? 11:49:01 13 A. Protestors. 14 Gibrit to work and ever seen protestors on West College Street or Friday, November 11h, correct? 15 Molnar Reporting Services, LLC (440) 340-6161  Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? 10 A. Yes. 11:49:01 12 Q. Okay. So what did you see? 11:49:01 13 Q. Okay. How many protestors? 14 A. Iddin't count them. 15 Q. Okay. Show the tide you demonstrators out there, out there? 18 A. No. 19 Q. Okay. Were there  | 11:49:51                                        |
| or East College Street? 11:47:30 6 A. Also possibly from the corner of 58 and 7 Lorain. 8 Q. Can you identify where that is on the 8 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 12 perpendicularly on the far side of Tappan Square. 13 Q. Okay. So is it your testimony that you 14 likely would have seen the demonstrations on West 15 College Street either from Route 58 or East 11:48:10 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 11:48:33 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 10 not sure whether you checked, but that's the 25 going to ask relate now solely to just Friday, 26 A. Which I believe we've agreed, and I'm 27 not sure whether you checked, but that's the 28 second day of protests? 29 Q. I will represent that is the second day 20 A res. 21 A. Yes. 22 A. Protestors. 23 Q. Okay. So shat did you see? 24 Second day of protests? 25 Q. I will represent that is the second day 26 A. Protestors. 27 A. Yes. 28 A. Which I believe we've agreed, and I'm 29 2016, correct? 30 Q. Okay. So shat did you see? 31 A. Yes. 31 A. Protestors. 32 Q. Okay. So shat did you see? 33 Q. Okay. So shat did you see? 44 Second day of protests? 55 Q. I will represent that is the second day 45 Second day of protests? 46 Q. Can you give me any range of bow man 47 protestors were one number less than 1,000 protestor were 48 Q. Okay. How many protestors? 49 Q. Okay. So is your testimony there were 50 Q. Okay. So is your testimony there were 51 Q. Okay. How many protestors were 52 Q. Okay. Were there a thousand protestors 53 Q. Okay. Were there a thousand protestors 54 A. Res. 55 Q. Okay. Were there a thousand protestors 55 Q. Okay. Were there a thousand protestors 56 Q. Okay. Were there a thousand protestors 57 A. Res. 58 College St |                                                 |
| 6 A. Also possibly from the corner of 58 and 7 College Street before? 9 Q. Can you identify where that is on the 9 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 12 perpendicularly on the far side of Tappan Square. 13 Q. Okay. So is it, your testimony that you likely would have seen the demonstrations on West 14 likely would have seen the demonstrations on West 15 College Street either from Route 58 or East 11:48:10 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So is you're driving to work. You see demonstrations taking place on West College Street or Lorain Street/Route 51? 19 See demonstrations taking place on West College Street which date? 20 Q. Friday. 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? 3 Q. Okay. So what did you see? 4 Q. Iwill represent that is the second day of protests, which I think you and have now agreed is Friday, November 11, 2016, correct? 3 Q. Okay. So what did you see? 4 Q. Iwill represent that is the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? 4 Q. Okay. So what did you see? 5 Q. I will represent that is the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? 4 Q. Okay. So what did you see? 5 Q. Okay. So what did you see? 6 Q. Okay. So what did you see? 7 A. I didn't count them. 8 Q. Okay. So with your testimony there were some number less than 1,000 demonstrators out there? 9 A. I don't know. 9 Q. Okay. So it's your testimony there were some number less than 1,000 demonstrators out there? 10 Q. Okay. So what did |                                                 |
| 7 College Street before? 8 Q. Can you identify where that is on the 9 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 12 perpendicularly on the far side of Tappan Square. 13 Q. Okay. So is it your testimory that you like yould have seen the demonstrations on West College Street either from Route 58 or East 11:48:10 15 College Street either from Route 58 or East 11:48:10 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You seed comonstrations taking place on West College Street or Lorain Street/Route 51? 19 see demonstrations taking place on West College Street. What exactly do you see? 20 Street. What exactly do you see? 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions Im going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests? 4 you do you got with me that as the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests? 5 Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and have now agreed is Friday, November 11, 2016, okay. So what did you see? 10 A. Yes. 11:49:01 12 Q. Okay. So what did you see? 12 A. Protestors, 11:49:01 13 Q. Okay. So what did you see? 14 A. I dim't rown them. 15 Q. Okay. How many protestors? 16 A. There were. 17 A. Yes. 18 A. Yes. 19 Q. Okay. Were there 10 and under 1,000 protestor out on West College Street when you drove to work? 19 Q. Okay. Were there a thousand protestors were out there, core less than 1,000 demonstrators out there, core                               | COL                                             |
| 8 Q. Can you identify where that is on the map? 9 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 12 perpendicularly on the fair side of Tappan Square. 13 Q. Okay. So is it your testimory that you likely would have seen the demonstrations on West 14 College Street either from Route 58 or East 11:48:10 15 College Street or Lorain Street/Route 51? 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You see demonstrations taking place on West College street what exactly do you see? 19 Street. What exactly do you see? 20 Street. What exactly do you see? 21 A. On Friday. 22 Q. Friday. 23 A. On Friday. 24 Q. And to be clear, all the questions I'm going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests, which I think you and Have now agreed is Friday, November 11, 2016, correct? 2 Q. I will represent that is the second day of protests, which I think you and Have now agreed is Friday, November 11, 20, Okay. So what did you see? 2 A. Protestors. 3 Q. Okay. So what did you see? 4 A. I didn't count them. 5 Q. Okay. So what did you see? 5 Q. I will represent that is the second day of protestors? 6 Q. Okay. So what did you see? 7 A. I didn't count them. 8 A. No. 9 Q. Okay. Were there a thousand protestors were out there; work? 9 A. I didn't count there, our darking you said there were. 10 Q. Okay. Hinderstand. I'm not asking you to speculate, but you said there were. 11 and there were. 12 Okay. Were there a thousand protestors. 13 Q. Okay. Were there a thousand protestors. 14 A. No. 15 Q. Okay. Were there a thousand protestors. 16 Q. Okay. Were there a thousand protestors. 17 A. Yes. 18 Q. Okay. So what did you see? 19 Q. Okay. Okay. Were there a thousand protestors. 19 Q. Okay. Were there a thousand protestors.                      |                                                 |
| 9 map? 10 A. Lorain, also known as Route 511. Lorain 11:47:42 11 Street or Route 511 intersects Route 58 12 perpendicularly on the far side of Tappan Square. 13 Q. Okay. So is it your testimony that you 14 likely would have seen the demonstrations on West 15 College Street either from Route 58 or East 11:48:10 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 21 A. Again, on which date? 22 Q. Friday. 23 A. On Priday? 24 Q. And to be clear, all the questions Im 25 going to ask relate now solely to just Friday, I1:48:41 25 going to ask relate now solely to just Friday, I1:48:51 3 November 11, 2016, okay? 4 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests, which I think you 5 and I have now agreed is Friday, November 111, 9 2016, correct? 10 A. Yes. 11 A. Yes. 11 A. Yes. 12 Q. Can you give me any range of how man protestors were for the second day of protests, which I think you 13 and I have now agreed is Friday, November 11, 9 Q. Okay. So what did you see? 11 A. Yes. 11 A. Yes. 12 Q. Can you give me any range of how man protestors were present that morning as you we driving to work? 14 A. Yes. 15 Callege Street or Lorain Street/Route 51? 16 A. I mean, it was preceded by protests the day before, so it wasn't surprising, no. 16 Q. Okay. So it's your testimony that there were some number less than 1,000 protestor on November 11th, correct? 22 M. Correct. 23 A. On Priday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 11:48:41 26 of protests, yes. So all of my questions relate to the second day of protests, which I think you 29 and I have now agreed is Friday, November 11, 29 2016, correct? 20 A. Protestors. 21 A. Yes. 22 A. Correct. 23 A. Orday. Were there 20? 24 A. I didn't count them. 25 Q. Okay. So what did you see? 26 A. There were. 27 A. I down the fact of the pr |                                                 |
| A. Lorain, also known as Route 511. Lorain 11:47:42  Street or Route 511 intersects Route 58  perpendicularly on the far side of Tappan Square.  Q. Okay. So is it your testimony that you likely would have seen the demonstrations on West College Street of Lorain Street/Route 51?  A. Yes, sir.  O. Okay. So syou're driving to work. You see demonstrations taking place on West College Street or Lorain Street/Route 51?  A. Yes, sir.  O. Okay. So you're driving to work. You see demonstrations taking place on West College Street or Lorain Street/Route 51?  A. A. Again, on which date?  O. Oriday.  A. A. Again, on which date?  O. Friday.  A. On Friday?  O. And to be clear, all the questions I'm going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  November 11, 2016, okay?  A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests?  O. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and the protestor should be pure speculation.  A. Yes.  O. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and the protest of the second day of protests, which I think you and the protest of the second day of protests, which I think you and the protest of the second day of protests, which I think you and the protest of the second day of protests, which I think you and the protest of the second day of protests which I think you and the protest of the second day of protests which I think you and the protest of the protest of the second day of protests, which I think you and the protest of the protest of the second day of protests, which I think you and the protest of th |                                                 |
| Street or Route 511 intersects Route 58 perpendicularly on the far side of Tappan Square.  Q. Okay. Okay. Os it your testimony that you likely would have seen the demonstrations on West College Street or Lorain Street/Route 519 College Street or Lorain Street/Route 519 A. Yes, sir.  Q. Okay. So you're driving to work. You see demonstrations taking place on West College Street or November 11, and the date?  A. Again, on which date?  Q. Priday.  A. On Friday?  A. On Friday?  A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So it's your testimony that there' to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So what did you see?  A. Protestors.  12 Q. Okay. Were there 20? A. I didn't court them. 15 Q. Okay. Were there a thousand protestors were out there? 16 Q. Okay. Were there a thousand protestors on November 19 asking you to speculate on how many protestors were out there? 17 ake for Tappa Square 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Sample Street ether from Protestors on West College Street when you drove to well asking you to speculate on how many protestors.  10 Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 protes  | 11:50:03                                        |
| perpendicularly on the far side of Tappan Square.  Q. Okay. So is it your testimony that you likely would have seen the demonstrations on West likely would have seen the demonstrations on West College Street either from Route 58 or East 11:48:10  College Street cither from Route 58 or East 11:48:10  College Street cuthar to College Street or Lorain Street/Route 51?  A. Yes, sir.  A. Yes, sir.  A. Yes, sir.  Q. Okay. So you're driving to work. You see demonstrations taking place on West College seed emonstrations taking place on West College seed that you trypically see when you're driving to work, correct?  A. Again, on which date?  Q. Friday.  A. On Friday?  Q. And to be clear, all the questions I'm going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC. (440) 340-6161  Page 59  November 11, 2016, okay?  A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate for the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So what did you see?  A. Protestors.  Q. Okay. So what did you see?  A. Protestors.  Q. Okay. How many protestors?  A. I didn't count them.  A. No.  O. Okay. Were there tan demonstrators out there, corre on the second in the protestors were present that morning as you work?  A. I don't know.  Q. Okay. So it's your testimony that there work?  A. I don't know.  Q. Okay. So it's your testimony there were some number less than 1,000 prote out on West College street when you drove to work?  A. I don't know.  Q. Okay. Were there 20?  A. I don't know.  Q. Okay. Were there 20?  A. I don't know.  Q. Okay. Were there 20?  A. Again, I'm not going to speculate, but you said there we less than 1,000 demonstratiors out there, corre and there, corre                                                                                                                                          | 11.50.05                                        |
| O. Okay. So is it your testimony that you likely would have seen the demonstrations on West College Street either from Route 58 or East 11:48:10 College Street either from Route 58 or East 11:48:10 College Street or Lorain Street/Route 51? A. Yes, sir. 17 O. Okay. So you're driving to work. You 18 O. Okay. So you're driving to work. You 20 Street. What exactly do you see? 11:48:33 A. A gain, on which date? 21 College Street on Friday. November 11th, is not som that you typically see when you're driving to work, correct? 22 O. Friday. 22 O. And to be clear, all the questions I'm 24 going to ask relate now soledy to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  November 11, 2016, okay? 1 A. Which I believe we've agreed, and I'm 2 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the second day of protests, which I think you 3 and I have now agreed is Friday, November 11, 2016, correct? 3 O. Day. So what did you see? 1 A. Yes. 11:49:01 O. A. Yes. 11:49:01 O. Okay. So what did you see? 11 A. Yes. 11:48:51 O. Okay. So what did you see? 11 O. Okay. How many protestors? 12 O. Okay. How many protestors? 13 O. Okay. How many protestors? 14 O. Okay. How many protestors were 16 O. Okay. Were there 20 there were. 11:29:01 O. Okay. Whom you didn't count them, but 11:49:11 O. Okay. Were there a thousand protestors were 16 O. Okay. Were there were. 11:29:01 O. Okay. Were there a thousand protestors were 16 O. Okay. Were there a thousand protestors were 19 O. Okay. Were there a thousand protestors were 19 O. Okay. Were there a thousand protestors were 19 O. Okay. Were there a thousand protestors were 19 O. Okay. Were there a thousand protestors were 19 O. Okay. Were there a thousand protestors 19 O. Okay.  | <b>et</b> e                                     |
| 14 likely would have seen the demonstrations on West 15 College Street either from Route 58 or East 11:48:10 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions Im 25 going to ask relate now solely to just Friday, 11:48:41 26 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? 5 Q. I will represent that is the second day 11:48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 9 20 (Okay. So what did you see? 11:49:01 10 A. Yes. 11:49:01 11 Q. Okay. How many protestors? 12 A. Protestors. 13 Q. Okay. How many protestors were 14 A. Again, I'm not going to speculate on how many protestors were 15 Q. Okay. Were there 20? 16 A. Protestors. 17 day before, so it wasn't surprising, no. 18 day before, so it wasn't surprising, no. 20 kay before, so it wasn't surprising, no. 20 Okay. So it's syour testimony that there were some number less than 1,000 protestors on that you typically see when you're driving to work create a for a  |                                                 |
| 15 College Street either from Route 58 or East 11:48:10 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 11:48:33 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 11:48:41 25 Mohar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? 5 Q. I will represent that is the second day 11:48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 11 Q. Okay. So what did you see? 12 A. Protestors. 13 Q. Okay. So what did you see? 14 A. Protestors. 15 Q. Okay. Were there 20? 16 Can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 10 Q. Okay. Were there a thousand protestors 11 Q. Okay. Were there a thousand protestors 12 A. No. 13 Q. Okay. Were there a thousand protestors 14 A. No. 15 Q. Okay. Were there a thousand protestors 15 Q. Okay. Were there a thousand protestors 20 Disky. Were there a thousand protestors 21 Q. Okay. Were there a thousand protestors 22 A. Correct. 23 Q. Okay. Were there a thousand protestors 24 Q. Okay. Were there a thousand protestors 25 Q. Can you give me any range of how man protestors were on November 11th, is not som that you typically see when you're driving to work? 26 Q. Okay. So it's your testimony that there were some number less than 1,000 protestor on November 11th, correct? 3 Q. Okay. So all of my questions relate on November 11th, correct? 4 A. Which I believe we've agreed, and I'm 4 A. Yes. 4 A. Which I believe we've agreed, and I'm 5 Q. Okay. So what did you see? 5 |                                                 |
| 16 College Street or Lorain Street/Route 51? 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions Im 25 going to ask relate now solely to just Friday, 11:48:41 26 Mohar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and Im 3 not sure whether you checked, but that's the 4 second day of protests? 4 Second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11 Q. Okay. So what did you see? 11 A. Yes. 12 Q. Can you give me any range of how man or sure whether you checked, but that's the 4 second day of protests? 5 Q. I will represent that is the second day 11:48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11.49:01 11 Q. Okay. So what did you see? 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. How many protestors were 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors                                                                                                                                                                                                                                                                                                                                                                                                          |                                                 |
| 17 A. Yes, sir. 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to sak relate now solely to just Friday, 26 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? 4 Q. I will represent that is the second day 11:48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 10 Q. Okay. So what did you see? 11 somewher between 10 and under 1,000 protestor work? 12 A. I didn't count them. 13 Q. Okay. How many protestors were 14 A. I didn't count them. 15 Q. Okay. Iknow you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 20 Q. Okay. Were there on the wash't surprising, no. Q. Okay. Were there a thousand protestors in that you typically see when protest cont work, correct? 22 A. Correct. 23 Q. Okay. So it's your testimony that there were some number less than 1,000 demonstrators out there on November 11th, correct? 24 Were some number less than 1,000 demonstrators out there on November 11th, correct? 3 Q. Okay. So it's your testimony there were on November 11th, correct? 4 driving to work? 4 driving to work? 5 A. It would be pure speculation. 6 Q. Okay. Were there ten demonstrators out there were. 9 Q. Okay. So it's your testimony there were some number less than 1,000 demonstrators out there were. 9 Q. Okay. So it's your testimony there were on November 11th, correct? 9 Q. Okay. So it's your testimony there were on November 11th asking on the protest of the protest |                                                 |
| 18 Q. Okay. So you're driving to work. You 19 see demonstrations taking place on West College 20 Street. What exactly do you see? 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 26 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests; 5 Q. I will represent that is the second day 4 second day of protests, yes. So all of my questions relate 5 of protests, yes. So all of my questions relate 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 10 A. Yes. 11:49:01 11 Q. Okay. So what did you see? 11 A. Yes. 11:49:01 12 Q. Okay. Were there 20? 13 Q. Okay. So it's your testimony that there were. 14 A. I didn't count them. 15 Q. Okay. How many protestors? 16 Can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 A. Yes. 10 A. Yes. 11:49:01 12 Q. Okay. Were there a thousand protestors 19 A. Yes. 10 A. Yes. 11:49:01 15 many there were. 11:49:11 16 can you estimate for me how many protestors were 19 A. Yes. 10 A. Yes. 11:49:01 11 A. Yes. 12 A. Yes. 13 Q. Okay. Friday, November 11, 14 A. Again, I'm not going to speculate on how many there were. 15 Q. Okay. Iknow you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors                                                                                                                                                                                                                                                                                                                                                                                      |                                                 |
| see demonstrations taking place on West College Street. What exactly do you see? 11:48:33 20 work, correct?  2 A. Again, on which date? 21 work, correct?  2 Q. Friday. 22 A. Correct.  2 Q. And to be clear, all the questions Im going to ask relate now solely to just Friday. 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 1 A. Yes. 2 Q. Can you give me any range of how man not sure whether you checked, but that's the second day of protests? 4 driving to work?  5 Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, orrect? 9 A. There were.  8 and I have now agreed is Friday, November 11, 2016, correct? 12 A. Protestors. 11:49:01 10 Q. Okay. So what did you see? 11:49:01 10 Q. Okay. So what did you see? 11 somewhere between 10 and under 1,000 protestor work? 11 Q. Okay. How many protestors were 11:49:11 15 many there were. 11:49:11 16 (Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there w | ae                                              |
| Street. What exactly do you see?  11:48:33  20 that you typically see when you're driving to work, correct?  21 A. Again, on which date?  22 Q. Friday.  23 A. On Friday?  24 Q. And to be clear, all the questions I'm going to ask relate now solely to just Friday, Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay?  2 A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests?  3 Q. I will represent that is the second day 11:48:51  4 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct?  2 A. Yes.  3 A. Yes.  4 A. Yes.  4 A. Yes.  5 Q. I will represent that is the second day 11:48:51  6 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct?  9 2016, correct?  10 A. Yes.  11:49:01  11 Q. Okay. So what did you see?  12 A. Protestors.  13 Q. Okay. So what did you see?  14 A. I didn't count them.  15 Q. Okay. Iknow you didn't count them, but 11:49:11  16 can you estimate for me how many protestors were one number less than 1,000 protestor on November 11, 20 work?  24 were some number less than 1,000 protestor.  25 Molnar Reporting Services, LLC (comerce) and in the many range of how many protestors were present that morning as you were driving to work?  4 A. I to would be pure speculation.  6 Q. Okay. Were there 20?  9 A. There were.  10 Q. Okay. So it's your testimony there were on November 11, 20 out on West College Street when you drove to work?  11 somewhere between 10 and under 1,000 protestor work?  12 out on West College Street when you drove to work?  13 a A. Again, I'm not going to speculate on how many there were.  14 A. Again, I'm not going to speculate on how many there were.  15 Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there we less than 1,000 demonstrators out there, corre less than 1,00 |                                                 |
| 21 A. Again, on which date? 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? Q. I will represent that is the second day 11:48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 10 Q. Okay. So what did you see? 11 Q. Okay. So what did you see? 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. I know you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were 10 Q. Okay. Were there a thousand protestors 11 A. Yes. 22 A. Correct. 23 Q. Okay. So it's your testimony that there were some number less than 1,000 protestor. 24 were some number less than 1,000 protestor. 25 Molnar Reporting Services, LLC (or Nonverted) and I'u deriving to on Noverted that there are resemble undering the were second and protestors ar | 11:50:31                                        |
| 22 Q. Friday. 23 A. On Friday? 24 Q. And to be clear, all the questions I'm 25 going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? Q. I will represent that is the second day 11:48:51 6 of protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 11 Q. Okay. So what did you see? 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. I know you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 A. Yes.  22 A. Correct. 23 Q. Okay, So it's your testimony that there were some number less than 1,000 protestor. 24 were some number less than 1,000 protestor. 25 mon November 11th, correct? 26 Molnar Reporting Services, LLC (decompleted in the protestors were some number less than 1,000 protestor. 26 Molnar Reporting Services, LLC (decompleted in the protestors were some number less than 1,000 protestor. 26 Molnar Reporting Services, LLC (decompleted in the protestors were some number less than 1,000 protestor. 27 Molnar Reporting Services, LLC (decompleted in the protestor were some number less than 1,000 protestor. 28 A. Yes. 29 Can you give me any range of how many protestors were some number less than 1,000 protestor. 29 Q. Okay. Were there 20? 30 Q. Okay. Well, I understand. I'm not many there were. 31 A. Yes. 31 A. Yes. 32 Q. Okay. Well, I understand. I'm not many there were. 31 A. There were. 31 A. Yes. 32 Q. Okay. Well, I understand. I'm not many there were. 34 A. Yes.                                                                                                         | 11.50.51                                        |
| A. On Friday?  Q. And to be clear, all the questions I'm going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  November 11, 2016, okay?  A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct?  A. Yes.  Q. Can you give me any range of how man protestors were present that morning as you with driving to work?  A. It would be pure speculation.  Q. Were there ten demonstrators out there?  A. I don't know.  Q. Okay. Were there 20?  A. I don't know.  Q. Okay. So what did you see?  A. I didn't count them.  Q. Okay. How many protestors?  A. I didn't count them.  Q. Okay. How many protestors were out there?  A. No.  Q. Okay. Were there a thousand protestors  A. No.  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                 |
| Q. And to be clear, all the questions Im going to ask relate now solely to just Friday, 11:48:41 Molnar Reporting Services, LLC (440) 340-6161  Page 59  November 11, 2016, okay?  A. Which I believe we've agreed, and I'm and sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So what did you see?  A. Protestors.  Q. Okay. So what did you see?  A. I didn't count them.  D. Okay. How many protestors?  A. I didn't count them.  D. Okay. I know you didn't count them, but 11:49:11 can you estimate for me how many protestors were on the sest han 1,000 protestors out there, corre were some number less than 1,000 protestor?  Molnar Reporting Services, LL.C (con November 11th, correct? Molnar Reporting Services, LL.C (con November 11th, con November 11th, correct? Molnar Reporting Services, LL.C (con November 11th, con November 11th, correct? Q. Can you give me any range of how man protestors were some number less than 1,000 demonstrators out there. 25 Q. Can you give me any range of how man protestors were some number less than 1,000 demonstrators out there. 25 Q. Can you give me any range of how man protestors were some number less than 1,000 demons |                                                 |
| page 59  November 11, 2016, okay?  A. Which I believe we've agreed, and I'm anot sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, Q. Okay. So what did you see?  A. Perotestors.  Q. Okay. So what did you see?  A. I didn't count them.  Q. Okay. How many protestors?  A. I didn't count them.  Language 59  1 A. Yes.  Q. Can you give me any range of how man protestors were present that morning as you we driving to work?  A. It would be pure speculation.  G. Q. Were there ten demonstrators out there!  A. I don't know.  Q. Okay. Were there 20?  A. I don't know.  Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 prote to out on West College Street when you drove to many there were.  A. I didn't count them.  Language 59  1 A. Yes.  A. I don't know.  Language 59  A. I don't know.  Language 50  A. Okay. Were there 20?  A. I don't know.  Language 50  A. I don't know.  Language 61  A. Again, I'm not going to speculate on how many there were.  Language 51  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                       | there                                           |
| Molnar Reporting Services, LLC (440) 340-6161  Page 59  November 11, 2016, okay?  A. Which I believe we've agreed, and I'm ont sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate of the second day of protests, which I think you and I have now agreed is Friday, November 11, O. Okay. So what did you see?  A. Protestors.  A. Protestors.  A. Protestors.  A. Protestors.  A. Protestors.  A. Protestors.  A. A Ragain, I'm not going to speculate on how many there were.  B. Q. Okay. Well, I understand. I'm not out there?  A. No.  B. Rain, I'm not going to speculate on how many there were.  B. Q. Okay. Well, I understand. I'm not out there?  A. No.  B. Rain, I'm out demonstrators out there were asking you to speculate, but you said there were.  B. A. No.  B. A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11:50:48                                        |
| Page 59  1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? 4 driving to work? 5 Q. I will represent that is the second day 6 protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 10 Q. Okay. So what did you see? 11 Q. Okay. So what did you see? 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. I know you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 A. Yes. 10 A. Yes. 11:49:01 12 A. Yes. 13 A. Yes. 14 A. Again, I'm not going to speculate on how many there were. 16 Q. Okay. Well, I understand. I'm not out there? 17 asking you to speculate, but you said there were. 18 A. No. 19 Q. Okay. Were there a thousand protestors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 40) 340-6161                                    |
| 1 November 11, 2016, okay? 2 A. Which I believe we've agreed, and I'm 3 not sure whether you checked, but that's the 4 second day of protests? 5 Q. I will represent that is the second day 6 protests, yes. So all of my questions relate 7 to the second day of protests, which I think you 8 and I have now agreed is Friday, November 11, 9 2016, correct? 10 A. Yes. 11:49:01 10 Q. Okay. Were there 20? 11 somewhere between 10 and under 1,000 protest 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. I know you didn't count them, but 11:49:11 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 Q. Okay. Were there a thousand protestors 19 A. Yes. 10 A. Yes. 11:49:01 11 A. Yes. 2 Q. Can you give me any range of how man protestors were driving to work? 4 driving to work? 4 driving to work? 5 A. It would be pure speculation. 6 Q. Were there ten demonstrators out there? 7 A. There were. 8 Q. Okay. Were there 20? 9 A. I don't know. 10 Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 prote to work? 11 work? 12 out on West College Street when you drove to work? 13 work? 14 A. Again, I'm not going to speculate on how many there were. 11:: 15 Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there we less than 1,000 demonstrators out there, correspond to the protestors of the protestors were of the protestors of the protestors of the protestors were of the protestors of the protestors of the protestors were of the protestors of the p | 40) 540 0101                                    |
| A. Which I believe we've agreed, and I'm not sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51  A. It would be pure speculation.  Go fprotests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2 Okay. Were there 20? A. Yes.  11:49:01  Q. Okay. So what did you see? A. Protestors. Q. Okay. How many protestors? A. I didn't count them. Q. Okay. I know you didn't count them, but 11:49:11 Can you give me any range of how many protestors were present that morning as you we driving to work? A. It would be pure speculation.  A. It would be pure speculation.  A. It would be pure speculation.  A. I there were.  A. I don't know.  Okay. Were there 20? A. I don't know.  Okay. So it's your testimony there were out on West College Street when you drove to work?  A. A dain, I'm not going to speculate on how many there were.  11:49:11 Can you estimate for me how many protestors were  Okay. Well, I understand. I'm not out there?  A. No.  Okay. Were there a thousand protestors  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Page 61                                         |
| not sure whether you checked, but that's the second day of protests?  Q. I will represent that is the second day 11:48:51 of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? A. Yes. 11:49:01 Q. Okay. So what did you see? A. Protestors. Q. Okay. So what did you see? A. I didn't count them. Q. Okay. How many protestors? A. I didn't count them. Q. Okay. I know you didn't count them, but 11:49:11 can you estimate for me how many protestors were Q. Okay. Were there a thousand protestors  A. No. Q. Okay. Were there a thousand protestors A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                 |
| 4 driving to work?  5 Q. I will represent that is the second day 11:48:51  6 of protests, yes. So all of my questions relate  7 to the second day of protests, which I think you  8 and I have now agreed is Friday, November 11,  9 2016, correct?  10 A. Yes.  11:49:01  11 Q. Okay. So what did you see?  12 A. Protestors.  13 Q. Okay. How many protestors?  14 A. I didn't count them.  15 Q. Okay. I know you didn't count them, but 11:49:11  16 can you estimate for me how many protestors were  18 A. No.  19 Q. Okay. Were there 20?  4 A. It would be pure speculation.  6 Q. Were there ten demonstrators out there?  7 A. There were.  8 Q. Okay. Were there 20?  9 A. I don't know.  10 Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 prote out on West College Street when you drove to work?  14 A. Again, I'm not going to speculate on how many there were.  15 Q. Okay. I know you didn't count them, but 11:49:11  16 can you estimate for me how many protestors were  17 out there?  18 A. No.  19 Q. Okay. Were there a thousand protestors  19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | r                                               |
| O. I will represent that is the second day 11:48:51  of protests, yes. So all of my questions relate  to the second day of protests, which I think you  and I have now agreed is Friday, November 11,  2016, correct?  A. Yes.  11:49:01  O. Okay. So what did you see?  A. Protestors.  O. Okay. How many protestors?  A. I didn't count them.  O. Okay. How many protestors were  and I have now agreed is Friday, November 11,  O. Okay. So what did you see?  A. Protestors.  O. Okay. So what did you see?  A. I didn't count them.  O. Okay. How many protestors?  A. I didn't count them.  O. Okay. I know you didn't count them, but 11:49:11  Can you estimate for me how many protestors were  out there?  A. No.  O. Okay. Were there a thousand protestors  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                 |
| of protests, yes. So all of my questions relate to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct? A. There were.  Q. Okay. Were there 20? A. I don't know.  Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 protestors.  Q. Okay. How many protestors?  A. I didn't count them.  Q. Okay. I know you didn't count them, but 11:49:11  Can you estimate for me how many protestors were out there?  A. No.  Q. Okay. Were there a thousand protestors  A. Yes.  Q. Okay. Were there ten demonstrators out there?  A. There were.  Q. Okay. Were there 20?  A. I don't know.  Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 protestor out on West College Street when you drove to work?  A. A Again, I'm not going to speculate on how many there were.  11::  Q. Okay. I know you didn't count them, but 11:49:11  15 many there were.  16 Q. Okay. Well, I understand. I'm not out there?  A. No.  18 less than 1,000 demonstrators out there, corre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | ere                                             |
| to the second day of protests, which I think you and I have now agreed is Friday, November 11, 2016, correct?  A. Yes.  11:49:01  Q. Okay. So what did you see?  A. Protestors.  Q. Okay. So what did you see?  A. Protestors.  Q. Okay. How many protestors?  A. I didn't count them.  Q. Okay. How many protestors?  A. I didn't count them.  Q. Okay. I know you didn't count them, but 11:49:11  Can you estimate for me how many protestors were  A. No.  Q. Okay. Were there 20?  A. I don't know.  Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 prote out on West College Street when you drove to work?  A. Again, I'm not going to speculate on how many there were.  11:10  Q. Okay. I know you didn't count them, but 11:49:11  A. No.  12 work?  A. Again, I'm not going to speculate on how many there were.  11:11:12  Q. Okay. Well, I understand. I'm not out there?  A. No.  18 less than 1,000 demonstrators out there, correct on the protestors of the protestor of the | ere                                             |
| and I have now agreed is Friday, November 11,  9 2016, correct?  10 A. Yes.  11:49:01  11 Q. Okay. So what did you see?  12 A. Protestors.  13 Q. Okay. How many protestors?  14 A. I didn't count them.  15 Q. Okay. I know you didn't count them, but 11:49:11  16 can you estimate for me how many protestors were  18 A. No.  19 Q. Okay. Were there 20?  9 A. I don't know.  10 Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 prote out on West College Street when you drove to work?  12 out on West College Street when you drove to work?  13 work?  14 A. Again, I'm not going to speculate on how many there were.  11::  16 can you estimate for me how many protestors were  16 Q. Okay. Well, I understand. I'm not out there?  17 asking you to speculate, but you said there we asking you to speculate, but you said there we less than 1,000 demonstrators out there, correct on the protestors of the protest | ere<br>11:50:59                                 |
| 9 2016, correct? 10 A. Yes. 11:49:01 10 Q. Okay. So it's your testimony there were 11 somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 11 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 protest of the somewhere between 10 and under 1,000 |                                                 |
| A. Yes. 11:49:01  Q. Okay. So what did you see?  A. Protestors.  Q. Okay. How many protestors?  A. I didn't count them.  Q. Okay. I know you didn't count them, but 11:49:11  Can you estimate for me how many protestors were  A. No.  Q. Okay. Were there a thousand protestors  10  Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 protestor work?  11  12  Q. Okay. So it's your testimony there were somewhere between 10 and under 1,000 protestor work?  13  Q. Okay. How many protestors?  14  A. Again, I'm not going to speculate on how many there were.  11:19  Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there were were.  14  A. No.  18  A. No.  19  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                 |
| 11 Somewhere between 10 and under 1,000 protes 12 A. Protestors. 13 Q. Okay. How many protestors? 14 A. I didn't count them. 15 Q. Okay. I know you didn't count them, but 11:49:11 15 many there were. 16 can you estimate for me how many protestors were 16 Q. Okay. Well, I understand. I'm not out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                 |
| A. Protestors.  Q. Okay. How many protestors?  14 A. I didn't count them.  15 Q. Okay. I know you didn't count them, but 11:49:11  16 can you estimate for me how many protestors were  17 out there?  18 A. No.  19 Q. Okay. Were there a thousand protestors  10 out on West College Street when you drove to work?  13 work?  14 A. Again, I'm not going to speculate on how many there were.  15 Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there were.  18 A. No.  18 less than 1,000 demonstrators out there, correct than 1,000 demonstrators out there, correct than 1,000 demonstrators out there.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 11:50:59                                        |
| Q. Okay. How many protestors?  1 A. I didn't count them.  Q. Okay. I know you didn't count them, but 11:49:11  15 can you estimate for me how many protestors were  16 Q. Okay. Well, I understand. I'm not out there?  17 out there?  18 A. No.  19 Q. Okay. Were there a thousand protestors  11 work?  A. Again, I'm not going to speculate on how many there were.  12 many there were.  13 work?  14 A. Again, I'm not going to speculate on how many there were.  15 Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there were.  18 A. No.  19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 11:50:59<br>11:51:13                            |
| A. I didn't count them.  Q. Okay. I know you didn't count them, but 11:49:11  16 can you estimate for me how many protestors were  17 out there?  18 A. No.  19 Q. Okay. Were there a thousand protestors  11:49:11  15 many there were.  16 Q. Okay. Well, I understand. I'm not asking you to speculate, but you said there were.  18 A. No.  18 less than 1,000 demonstrators out there, correct than 1,000 demonstrators out there.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 11:50:59<br>11:51:13                            |
| Q. Okay. I know you didn't count them, but 11:49:11 15 many there were. 11:11   16 can you estimate for me how many protestors were 16 Q. Okay. Well, I understand. I'm not 17 asking you to speculate, but you said there were 18 A. No. 18 less than 1,000 demonstrators out there, corresponding Q. Okay. Were there a thousand protestors 19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 11:50:59<br>11:51:13                            |
| 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Well, I understand. I'm not 17 asking you to speculate, but you said there we 18 than 1,000 demonstrators out there, corre 19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 11:50:59<br>11:51:13                            |
| 16 can you estimate for me how many protestors were 17 out there? 18 A. No. 19 Q. Okay. Well, I understand. I'm not 17 asking you to speculate, but you said there we 18 than 1,000 demonstrators out there, corre 19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 11:50:59<br>11:51:13<br>stors                   |
| 17 out there? 18 A. No. 19 Q. Okay. Were there a thousand protestors 11 asking you to speculate, but you said there we less than 1,000 demonstrators out there, correspond A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 11:50:59<br>11:51:13<br>stors                   |
| 18 A. No. 19 Q. Okay. Were there a thousand protestors 19 A. Yes. 18 less than 1,000 demonstrators out there, corre                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 11:50:59<br>11:51:13<br>stors                   |
| 19 Q. Okay. Were there a thousand protestors 19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 11:50:59<br>11:51:13<br>stors                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11:50:59<br>11:51:13<br>stors<br>1:27           |
| 20 out there? 11:49:22 20 Q. And you also said that there were at                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 11:50:59<br>11:51:13<br>stors<br>1:27           |
| 21 A. No. 21 least ten demonstrators out there, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 11:50:59<br>11:51:13<br>stors<br>1:27           |
| Q. Okay. Approximately 500? 22 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 11:50:59  11:51:13 stors  1:27 ee               |
| 23 A. I don't know. 23 Q. So is your best testimony this morning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 11:50:59  11:51:13 stors  1:27 ee               |
| 24 Q. Okay. Approximately 250? 24 that the number of demonstrators outside on V                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11:50:59  11:51:13 stors  1:27 ee               |
| 25 A. Again, I didn't count them. 11:49:36 25 College Street were somewhere between ten a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 11:50:59  11:51:13 stors  1:27 re ct?  11:51:37 |
| Molnar Reporting Services, LLC (440) 340-6161 Molnar Reporting Services, LLC (4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11:50:59  11:51:13 stors  1:27 ee st?  11:51:37 |

| 1                                                                                                | Page 62                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                       | Page 64                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                | less than a thousand?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 1                                                                                                     | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2                                                                                                | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2                                                                                                     | Q. Approximately for how long were you able                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3                                                                                                | Q. Okay. And that's your best                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 3                                                                                                     | to see that these demonstrations were taking                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4                                                                                                | recollection?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 4                                                                                                     | place there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 5                                                                                                | A. I could speculate closer, but I'm not 11:51:59                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 5                                                                                                     | A. Strictly during my commute? 11:54:32                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 6                                                                                                | going to.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 6                                                                                                     | Q. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 7                                                                                                | Q. Okay. And again, I don't want you to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 7                                                                                                     | A. Until my car passed the line of sight                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8                                                                                                | speculate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 8                                                                                                     | that would have been blocked by buildings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9                                                                                                | So your best testimony this morning is                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 9                                                                                                     | Q. Did you actually stop your car at all to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10                                                                                               | that there were somewhere between ten and some 11:52:06                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 10                                                                                                    | get a better look as to what was going on? 11:54:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 11                                                                                               | number under 1,000 protestors on West College                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 11                                                                                                    | A. I parked at my office.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12                                                                                               | Street on November 11th, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 12                                                                                                    | Q. Okay. But let me just – prior to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 13                                                                                               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 13                                                                                                    | parking at your office, did you stop your car                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 14                                                                                               | Q. Okay. As you were driving into work and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 14                                                                                                    | when you saw that there were demonstrations going                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 15                                                                                               | you saw these demonstrators, did you see signs? 11:52:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 15                                                                                                    | on to get a better look at the demonstrations? 11:55:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 16                                                                                               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 16                                                                                                    | A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 17                                                                                               | Q. Were you able to read any of the signs?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 17                                                                                                    | Q. Okay. Did you slow your car down in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 18                                                                                               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 18                                                                                                    | order to get a better look at the demonstrations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 19                                                                                               | Q. Okay. What did the signs say?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 19                                                                                                    | that morning?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 20                                                                                               | A. I don't remember. 11:52:32                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 20                                                                                                    | A. I don't know. 11:55:20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 21                                                                                               | Q. Can you estimate for me how many people                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 21                                                                                                    | Q. Did you take any type of detour from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 22                                                                                               | were carrying signs or holding signs?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 22                                                                                                    | your path of travel to work in order to get a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 23                                                                                               | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 23                                                                                                    | better look at the demonstrators?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 24                                                                                               | Q. And you can't recall what the signs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 24                                                                                                    | A. I don't remember.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 25                                                                                               | said; is that true? 11:52:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 25                                                                                                    | Q. Did you roll down your window to hear 11:55:35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2.5                                                                                              | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 25                                                                                                    | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                  | (110) and 140 |                                                                                                       | montal reporting Services, Ede (110) 510 0101                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                  | Page 63                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                       | Page 65                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1                                                                                                | A. That is true.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 1                                                                                                     | what, if anything, the demonstrators might be                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2                                                                                                | Q. Okay. As you were driving to work on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2                                                                                                     | saying?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3                                                                                                | November 11, were you able to identify any of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3                                                                                                     | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4                                                                                                | protestors?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 4                                                                                                     | <ul> <li>Q. Okay. So you've testified that you saw</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 5                                                                                                | A. No. 11:53:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 5                                                                                                     | signs that morning, correct? 11:55:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 6                                                                                                | Q. Okay. Do you know whether any of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 6                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 7                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1                                                                                                     | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                  | protestors that morning were students?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7                                                                                                     | Q. Did you hear anything?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 8                                                                                                | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7<br>8                                                                                                | <ul><li>Q. Did you hear anything?</li><li>MR. KESLAR: Objection. Invades the</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8<br>9                                                                                           | <ul><li>A. No.</li><li>Q. Do you know if any of the - strike</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7<br>8<br>9                                                                                           | <ul><li>Q. Did you hear anything?</li><li>MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8<br>9<br>10                                                                                     | A. No. Q. Do you know if any of the – strike that. 11:53:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 7<br>8<br>9<br>10                                                                                     | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8<br>9<br>10<br>11                                                                               | <ul> <li>A. No.</li> <li>Q. Do you know if any of the – strike</li> <li>that. 11:53:27</li> <li>Do you know if any of the protestors</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7<br>8<br>9<br>10<br>11                                                                               | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8<br>9<br>10<br>11<br>12                                                                         | <ul> <li>A. No.</li> <li>Q. Do you know if any of the – strike</li> <li>that. 11:53:27</li> <li>Do you know if any of the protestors</li> <li>were faculty members?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 7<br>8<br>9<br>10<br>11                                                                               | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8<br>9<br>10<br>11<br>12<br>13                                                                   | <ul> <li>A. No.</li> <li>Q. Do you know if any of the – strike</li> <li>that. 11:53:27</li> <li>Do you know if any of the protestors</li> <li>were faculty members?</li> <li>A. No.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8<br>9<br>10<br>11<br>12<br>13                                                                   | <ul> <li>A. No.</li> <li>Q. Do you know if any of the - strike</li> <li>that. 11:53:27</li> <li>Do you know if any of the protestors</li> <li>were faculty members?</li> <li>A. No.</li> <li>Q. Do you know if any of the protestors</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | <ul> <li>A. No.</li> <li>Q. Do you know if any of the - strike</li> <li>that. 11:53:27</li> <li>Do you know if any of the protestors</li> <li>were faculty members?</li> <li>A. No.</li> <li>Q. Do you know if any of the protestors</li> <li>were staff members associated with Oberlin 11:53:42</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced the second of th |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced the privilege is entirely misplaced without any foundation whatsoever.  Q. So you're driving to work, you see that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced the privilege is entirely misplaced that without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced the privilege is entirely misplaced that without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday, November 11th, did you see Meredith Raimondo 11:54:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00 the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13 without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the demonstrators?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday, November 11th, did you see Meredith Raimondo outside?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00 the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13 without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the demonstrators? 11:56:31  A. I don't remember whether I did.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday, November 11th, did you see Meredith Raimondo outside? A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00 the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13 without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the demonstrators? 11:56:31  A. I don't remember whether I did.  Q. Okay. Did you make any observations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday, November 11th, did you see Meredith Raimondo outside? A. I don't recall. Q. Okay. So you're driving to work and you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00 the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13 without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the demonstrators? 11:56:31  A. I don't remember whether I did.  Q. Okay. Did you make any observations about the racial composition of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday, November 11th, did you see Meredith Raimondo outside? A. I don't recall. Q. Okay. So you're driving to work and you see that there were demonstrations occurring on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00 the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13 without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the demonstrators?  11:56:31  A. I don't remember whether I did.  Q. Okay. Did you make any observations about the racial composition of the demonstrators?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. No. Q. Do you know if any of the – strike that. 11:53:27 Do you know if any of the protestors were faculty members? A. No. Q. Do you know if any of the protestors were staff members associated with Oberlin 11:53:42 College? A. No. Q. As you were driving to work that morning, and again we're talking about Friday, November 11th, did you see Meredith Raimondo outside? A. I don't recall. Q. Okay. So you're driving to work and you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. Did you hear anything?  MR. KESLAR: Objection. Invades the reporter's privilege. To the extent that it calls for unpublished information gathered during 11:56:00 the reporting process, it's protected by the First Amendment to the U.S. Constitution. You don't have to answer that question.  MR. HOLMAN: Again, I think the assertion of the privilege is entirely misplaced 11:56:13 without any foundation whatsoever.  Q. So you're driving to work, you see that there are demonstrators out there. Did you hear any noise or sounds coming from the demonstrators? 11:56:31  A. I don't remember whether I did.  Q. Okay. Did you make any observations about the racial composition of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

|                                        | Page 66                                                                                                                                                                                                          |                                        | Page 68                                                                                                                                                                  |
|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| -1                                     |                                                                                                                                                                                                                  | ,                                      |                                                                                                                                                                          |
| 1<br>2                                 | <ul> <li>Q. So it's your sworn testimony today that</li> <li>as you were driving to work, you did not identify</li> </ul>                                                                                        | $\begin{bmatrix} 1 \\ 2 \end{bmatrix}$ | creating a dangerous driving situation for others                                                                                                                        |
|                                        |                                                                                                                                                                                                                  | 3                                      | on the road?                                                                                                                                                             |
| 3                                      | any specific person who was part of this protest,                                                                                                                                                                | 1                                      | A. No.                                                                                                                                                                   |
| 4                                      | correct?                                                                                                                                                                                                         | 4                                      | Q. Okay. So you arrived at work, and what                                                                                                                                |
| 5                                      | A. No, that's not correct. 11:57:05                                                                                                                                                                              | 5                                      | did you do next? 11:59:10                                                                                                                                                |
| 6                                      | Q. Okay, So who did you identify?                                                                                                                                                                                | 6                                      | A. I don't recall.                                                                                                                                                       |
| 7                                      | A. I don't know.                                                                                                                                                                                                 | 7                                      | Q. Okay. Did you stay – by the way, what                                                                                                                                 |
| 8                                      | Q. So can you identify anyone who you saw                                                                                                                                                                        | 8                                      | floor is the newspaper on?                                                                                                                                               |
| 9                                      | as you were driving to work and saw that there                                                                                                                                                                   | 9                                      | A. It's currently on a single floor, and it                                                                                                                              |
| 10                                     | was a demonstration taking place that morning? 11:57:19                                                                                                                                                          | 10                                     | was at the time as well. 11:59:25                                                                                                                                        |
| 11                                     | A. No.                                                                                                                                                                                                           | 11                                     | Q. Okay. Which floor is that?                                                                                                                                            |
| 12                                     | Q. Okay. So again, it's your sworn                                                                                                                                                                               | 12                                     | A. The first floor.                                                                                                                                                      |
| 13                                     | testimony today that as you were driving past the                                                                                                                                                                | 13                                     | Q. The first floor. Okay, Did you stay in                                                                                                                                |
| 14                                     | demonstration on November 11th, you cannot                                                                                                                                                                       | 14                                     | your office the entire day?                                                                                                                                              |
| 15                                     | identify anyone that you recognized, correct? 11:57:31                                                                                                                                                           | 15                                     | A. No. 11:59:34                                                                                                                                                          |
| 16                                     | A. That's a slightly different question                                                                                                                                                                          | 16                                     | Q. Okay. So at some point in the day, you                                                                                                                                |
| 17                                     | than your one before, but yes.                                                                                                                                                                                   | 17                                     | left your office, correct?                                                                                                                                               |
| 18                                     | Q. Okay. So I'll ask it another way.                                                                                                                                                                             | 18                                     | A. Yes.                                                                                                                                                                  |
| 19                                     | Did you recognize anyone on November                                                                                                                                                                             | 19                                     | Q. Did you leave the office in the morning                                                                                                                               |
| 20                                     | 11th as you were going to work? 11:57:45                                                                                                                                                                         | 20                                     | or in the afternoon? 11:59:45                                                                                                                                            |
| 21                                     | A. Not to my recollection.                                                                                                                                                                                       | 21                                     | MR. KESLAR: Just so I know, are you                                                                                                                                      |
| 22                                     | Q. Did you identify anyone as you were                                                                                                                                                                           | 22                                     | talking about his specific office within the                                                                                                                             |
| 23                                     | going to work on November 11th?                                                                                                                                                                                  | 23                                     | building or are you talking about office                                                                                                                                 |
| 24                                     | A. I don't believe so, no.                                                                                                                                                                                       | 24                                     | generally, the Oberlin news times building?                                                                                                                              |
| 25                                     | Q. Did you try to identify anyone on 11:58:03                                                                                                                                                                    | 25                                     | MR. HOLMAN: Oh, okay. Good. That's a 11:59:56                                                                                                                            |
|                                        | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                    |                                        | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                            |
|                                        | Page 67                                                                                                                                                                                                          |                                        | Page 69                                                                                                                                                                  |
| 1                                      | November 11th?                                                                                                                                                                                                   | 1                                      | good point. So let's back up.                                                                                                                                            |
| 2                                      | A. As I was going to work?                                                                                                                                                                                       | 2                                      | Q. So on November 11th, you went to your                                                                                                                                 |
| 3                                      | Q. Yes.                                                                                                                                                                                                          | 3                                      | office building, correct?                                                                                                                                                |
| 4                                      | A. No, I was safely operating my vehicle.                                                                                                                                                                        | 4                                      | A. Yes.                                                                                                                                                                  |
| 5                                      | Q. Okay. Did you look at the 11:58:17                                                                                                                                                                            | 5                                      | Q. And on November 11th, you actually went 12:00:04                                                                                                                      |
| 6                                      | demonstrations while you were driving your                                                                                                                                                                       | 6                                      | into first of all, do you have a private                                                                                                                                 |
| 7                                      | vehicle?                                                                                                                                                                                                         | 7                                      | office?                                                                                                                                                                  |
| 8                                      | A. Yes.                                                                                                                                                                                                          | 8                                      | A. No.                                                                                                                                                                   |
| 9                                      | Q. Okay. Is that safe?                                                                                                                                                                                           | 9                                      | Q. Okay. So you work in an office inside                                                                                                                                 |
| 10                                     | A. Within limited parameters, yes. 11:58:26                                                                                                                                                                      | 10                                     | the building, correct? 12:00:16                                                                                                                                          |
| 11                                     | Q. Okay. Do you believe that you were                                                                                                                                                                            | 11                                     | A. Yes.                                                                                                                                                                  |
| 12                                     | operating within such limited safe parameters?                                                                                                                                                                   | 12                                     | Q. How many other people work with you                                                                                                                                   |
| 13                                     | A. So as to see the people who were out on                                                                                                                                                                       | 13                                     | inside that same space?                                                                                                                                                  |
| 14                                     | the sidewalk within plain view, yes.                                                                                                                                                                             | 14                                     | A. Currently?                                                                                                                                                            |
| 15                                     | Q. Okay. You don't believe that you were 11:58:40                                                                                                                                                                | 15                                     | Q. Let's go back to November of 2016. 12:00:24                                                                                                                           |
| 16                                     | creating a dangerous situation for yourself?                                                                                                                                                                     | 16                                     | A. When you say inside the same space, you                                                                                                                               |
| 17                                     | A. I was not craning my neck or slamming on                                                                                                                                                                      | 17                                     | mean the open space at the front of the office?                                                                                                                          |
| 1.7                                    | my brakes or creating a traffic hazard in any                                                                                                                                                                    | 18                                     | Q. Okay. Let's back up a little bit.                                                                                                                                     |
|                                        |                                                                                                                                                                                                                  | 19                                     | What is the address again of the Oberlin                                                                                                                                 |
| 18                                     |                                                                                                                                                                                                                  |                                        |                                                                                                                                                                          |
| 18<br>19                               | way. I was keeping my eyes on the road and still                                                                                                                                                                 | Į.                                     | News Tribune? 12:00:45                                                                                                                                                   |
| 18<br>19<br>20                         | way. I was keeping my eyes on the road and still was able to see what was happening. 11:58:50                                                                                                                    | 20                                     | News Tribune? 12:00:45 A 42 South Main Street                                                                                                                            |
| 18<br>19<br>20<br>21                   | way. I was keeping my eyes on the road and still was able to see what was happening. 11:58:50 Q. Okay. My question is you didn't think                                                                           | 20<br>21                               | A. 42 South Main Street.                                                                                                                                                 |
| 18<br>19<br>20<br>21<br>22             | way. I was keeping my eyes on the road and still was able to see what was happening.  Q. Okay. My question is you didn't think that you were creating a dangerous driving                                        | 20<br>21<br>22                         | <ul><li>A. 42 South Main Street.</li><li>Q. Okay. Thank you. And in November 2016,</li></ul>                                                                             |
| 18<br>19<br>20<br>21<br>22<br>23       | way. I was keeping my eyes on the road and still was able to see what was happening. 11:58:50 Q. Okay. My question is you didn't think that you were creating a dangerous driving situation for yourself?        | 20<br>21<br>22<br>23                   | <ul> <li>A. 42 South Main Street.</li> <li>Q. Okay. Thank you. And in November 2016,</li> <li>the Tribune had an office on the first floor,</li> </ul>                   |
| 18<br>19<br>20<br>21<br>22<br>23<br>24 | way. I was keeping my eyes on the road and still was able to see what was happening. 11:58:50 Q. Okay. My question is you didn't think that you were creating a dangerous driving situation for yourself? A. No. | 20<br>21<br>22<br>23<br>24             | <ul> <li>A. 42 South Main Street.</li> <li>Q. Okay. Thank you. And in November 2016,</li> <li>the Tribune had an office on the first floor,</li> <li>correct?</li> </ul> |
| 18<br>19<br>20<br>21<br>22<br>23       | way. I was keeping my eyes on the road and still was able to see what was happening. 11:58:50 Q. Okay. My question is you didn't think that you were creating a dangerous driving situation for yourself?        | 20<br>21<br>22<br>23                   | <ul> <li>A. 42 South Main Street.</li> <li>Q. Okay. Thank you. And in November 2016,</li> <li>the Tribune had an office on the first floor,</li> </ul>                   |

|        | Page 70                                                          | Ι      | Page 72                                                                   |
|--------|------------------------------------------------------------------|--------|---------------------------------------------------------------------------|
| 4      |                                                                  | 1      |                                                                           |
| 1      | Q. How many different, discrete offices                          | 1 2    | reporter's privilege and the editorial process.                           |
| 2<br>3 | made up the Tribune in November 2016?                            | 2 3    | It's definitely protected by the First Amendment                          |
|        | A. You mean workspaces?                                          | 4      | of the U.S. Constitution.                                                 |
| 4      | Q. Yes.                                                          | 1      | You don't have to answer that question.                                   |
| 5<br>6 | A. There are three discrete workspaces. 12:01:11                 | 5      | Q. So where did you go? 12:03:14                                          |
| 7      | Q. Okay.                                                         | 6      | A. Obviously, at one point, I went home. I                                |
| 8      | A. Then and now.     Q. And back in November 2016, you worked at | 7<br>8 | assume that we're talking about during the                                |
| 9      | · · ·                                                            | 9      | workday, though.                                                          |
| 10     | one of those three workspaces, correct?  A. Yes. 12:01:24        | 10     | Q. I just want to know why you left at any point during the day. 12:03:28 |
| 11     |                                                                  | 11     |                                                                           |
|        | Q. Okay. In November 2016, did you share                         | 12     | <ul> <li>A. I did go to look at the protesting,<br/>yeah.</li> </ul>      |
| 12     | the space that you worked in with anyone else?                   | 13     |                                                                           |
| 13     | A. Yes.                                                          | 1      | Q. Okay. About what time was that?                                        |
| 14     | Q. Okay. And who else did you share that                         | 14     | A. I don't know.                                                          |
| 15     | space with? 12:01:34                                             | 15     | Q. Okay. And how did you get to the 12:03:39                              |
| 16     | MR. KESLAR: That question goes to the                            | 16     | protests?                                                                 |
| 17     | editorial process. It's protected by the First                   | 17     | A. By foot.                                                               |
| 18     | Amendment to the U.S. Constitution.                              | 18     | Q. Can you estimate for me the distance                                   |
| 19     | You don't have to answer that question,                          | 19     | between your office and where the protests were                           |
| 20     | Q. So did you stay in your workspace the 12:01:44                | 20     | taking place? 12:03:51                                                    |
| 21     | entire day?                                                      | 21     | A. We're on the same block. I don't know.                                 |
| 22     | A. No.                                                           | 22     | I'm not really good with distances.                                       |
| 23     | Q. Okay. Did you go into the other                               | 23     | Q. How long did it take you to walk there?                                |
| 24     | workspaces that day?                                             | 24     | A. Three, four minutes.                                                   |
| 25     | A. Yes. 12:01:59                                                 | 25     | Q. Did you walk down Route 58 and then turn 12:04:12                      |
|        | Molnar Reporting Services, LLC (440) 340-6161                    |        | Molnar Reporting Services, LLC (440) 340-6161                             |
|        | Page 71                                                          |        | Page 73                                                                   |
| 1      | Q. Okay. Did you leave the building that                         | 1      | left on West College Street?                                              |
| 2      | you've identified as 42 South Main Street at any                 | 2      | A. Yes.                                                                   |
| 3      | point during the day?                                            | 3      | Q. Were you alone?                                                        |
| 4      | A. Yes.                                                          | 4      | MR. KESLAR: Objection. That goes to                                       |
| 5      | Q. When did you leave the building? 12:02:12                     | 5      | the reporter's privilege and the editorial 12:04:30                       |
| 6      | A. I don't know.                                                 | 6      | process. You don't have to answer that question.                          |
| 7      | Q. Okay. Was it in the morning?                                  | 7      | Q. Were you carrying paper with you?                                      |
| 8      | A. Again, I don't recall.                                        | 8      | A. Yes.                                                                   |
| 9      | Q. Was it in the afternoon?                                      | 9      | Q. Did you have a pen on your person?                                     |
| 10     | A. That's the same question. 12:02:22                            | 10     | A. Yes. 12:04:50                                                          |
| 11     | Q. It's a different question.                                    | 11     | Q. Did you have a recording device of any                                 |
| 12     | Did you leave the building in the                                | 12     | kind with you?                                                            |
| 13     | morning?                                                         | 13     | A. Yes.                                                                   |
| 14     | A. I don't know.                                                 | 14     | Q. Did you have a camera?                                                 |
| 15     | Q. Okay. Did you leave it in the 12:02:29                        | 15     | A. Yes. 12:05:05                                                          |
| 16     | afternoon?                                                       | 16     | Q. Was it a single-lens reflex?                                           |
| 17     | A. I don't know.                                                 | 17     | A. You know, I'm unsure.                                                  |
| 18     | Q. Okay. Did you leave it at night?                              | 18     | Q. Okay. Did you have a microphone with                                   |
| 19     | A. I don't know.                                                 | 19     | you?                                                                      |
| 20     | Q. Okay. So at some point on November 12:02:39                   | 20     | A. No. 12:05:26                                                           |
| 21     | 11th, you left the paper's office at 42 South                    | 21     | Q. Did you have any type of –                                             |
| 22     | Main Street, correct?                                            | 22     | A. Well, actually, my phone does have a                                   |
| 23     | A. Yes.                                                          | 23     | microphone in it, yes.                                                    |
| 24     | Q. Why did you leave?                                            | 24     | Q. Okay.                                                                  |
| 25     | MR. KESLAR: That question goes to both 12:02:59                  | 25     | A. But as far as a handheld microphone, is 12:05:35                       |
|        | Molnar Reporting Services, LLC (440) 340-6161                    |        | Molnar Reporting Services, LLC (440) 340-6161                             |
|        | (170) 510 5101                                                   |        | 1.152102 1cepotining per 11000; DDO (110) 510-0101                        |

|                            | Page 74                                                                                                                                                |                | Page 76                                                                                           |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|---------------------------------------------------------------------------------------------------|
| 1                          | that what you're asking?                                                                                                                               | 1              | A. I don't recall.                                                                                |
| 2                          | Q. Yes.                                                                                                                                                | 2              | Q. When you arrived on November 11th at the                                                       |
| 3                          | A. No.                                                                                                                                                 | 3              | site of the demonstrations, did you recognize                                                     |
| 4                          | Q. Okay. Did you carry with you any type                                                                                                               | 4              | anyone that you knew?                                                                             |
| 5                          | of dictation device? 12:05:43                                                                                                                          | 5              | A. I'm sorry, but the lines between what 12:08:39                                                 |
| 6                          | A. Again, my phone is capable of taking                                                                                                                | 6              | happened on that Thursday and that Friday are                                                     |
| 7                          | dictation.                                                                                                                                             | 7              | very blurred, so I don't recall,                                                                  |
| 8                          | Q. Okay. So other than your phone, did you                                                                                                             | 8              | Q. Okay. So you don't recall seeing anyone                                                        |
| 9                          | carry on your person any other type of recording                                                                                                       | 9              | that you recognize on Friday, November 11th? Is                                                   |
| 10                         | device that morning? 12:05:52                                                                                                                          | 10             | that your testimony? 12:08:55                                                                     |
| 11                         | A. A camera, yes.                                                                                                                                      | 11             | MR. KESLAR: Objection. That's a                                                                   |
| 12                         | Q. Okay, Anything else to record audio?                                                                                                                | 12             | mischaracterization of his testimony.                                                             |
| 13                         | A. In addition to the phone or the camera?                                                                                                             | 13             | You can go ahead and answer.                                                                      |
| 14                         | Q. Yes.                                                                                                                                                | 14             | A. I don't recall specifically which day I                                                        |
| 15                         | A. No. 12:06:01                                                                                                                                        | 15             | saw people and which day I didn't see people. 12:09:04                                            |
| 16                         | Q. Anything else to record video?                                                                                                                      | 16             | Q. Okay. But my question is more specific                                                         |
| 17<br>18                   | <ul><li>A. In addition to the phone or the camera?</li><li>O. Yes.</li></ul>                                                                           | 17             | than that.                                                                                        |
| 19                         | Q. Yes.<br>A. No.                                                                                                                                      | 19             | Can you identify anyone who you saw with certainty on Friday, November 11th, at the               |
| 20                         | Q. Okay. So you walked to where the 12:06:08                                                                                                           | 20             | demonstration? 12:09:24                                                                           |
| 21                         | demonstrations were occurring.                                                                                                                         | 21             | A. With certainty that I saw them on the                                                          |
| 22                         | What did you see upon arriving there?                                                                                                                  | 22             | 11th? No.                                                                                         |
| 23                         | A. There was a protest going on.                                                                                                                       | 23             | Q. So how long did you stay at the                                                                |
| 24                         | Q. About how many demonstrators were there?                                                                                                            | 24             | demonstrations on November 11th?                                                                  |
| 25                         | A. I – I'm not going to speculate on it. 12:06:25                                                                                                      | 25             | A. I don't know. 12:09:37                                                                         |
|                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                          |                | Molnar Reporting Services, LLC (440) 340-6161                                                     |
| -                          | ·                                                                                                                                                      |                |                                                                                                   |
|                            | Page 75                                                                                                                                                |                | Page 77                                                                                           |
| 1                          | Q. Okay. 1,000?                                                                                                                                        | 1              | Q. Did you stay an hour?                                                                          |
| 2                          | A. Probably not.                                                                                                                                       | 2              | A. I don't know.                                                                                  |
| 3                          | Q. Okay. 500?                                                                                                                                          | 3              | Q. Two hours?                                                                                     |
| 4                          | A. Probably not as well.                                                                                                                               | 4              | A. I don't know.                                                                                  |
| 5                          | Q. 250? 12:06:40                                                                                                                                       | 5              | Q. Three hours? 12:09:47                                                                          |
| 6                          | A. That seems reasonable.                                                                                                                              | 6<br>7         | A. No.                                                                                            |
| 8                          | Q. Okay. So as you saw strike that.  So you arrived at where the protests                                                                              | 8              | Q. Okay. So you stayed less than three                                                            |
| ٩                          |                                                                                                                                                        | ٩              | hours on Friday, November 11th? A. Yes.                                                           |
| 10                         | were taking place. You saw approximately 250 people demonstrating. 12:07:00                                                                            | 10             | Q. Why did you go to the demonstrations on 12:10:01                                               |
| 11                         | Were some of those individuals carrying                                                                                                                | 11             | that day?                                                                                         |
| 12                         | signs?                                                                                                                                                 | 12             | MR, KESLAR: Objection, That goes to                                                               |
| 13                         | A. Yes.                                                                                                                                                | 13             | the reporter's privilege and the editorial                                                        |
| 14                         | Q. Okay. What did the signs say?                                                                                                                       | 14             | process, protected by the U.S. Constitution First                                                 |
| 15                         | A. I don't recall. 12:07:14                                                                                                                            | 15             | Amendment. 12:10:08                                                                               |
| 16                         | Q. So you don't recall what any of the                                                                                                                 | 16             | You don't have to answer that.                                                                    |
| 17                         | signs said?                                                                                                                                            | 17             | Q. Did you attend the demonstrations on                                                           |
| 18                         | A. No.                                                                                                                                                 | 18             | November 11th as a member of the community?                                                       |
|                            | Q. Okay. Were the demonstrators chanting?                                                                                                              | 19             | A. The newspaper is a member of the                                                               |
| 19                         | 10.00.00                                                                                                                                               | 20             | community, yes. 12:10:24                                                                          |
| 19<br>20                   | A. Yes. 12:07:33                                                                                                                                       |                |                                                                                                   |
|                            | A. Yes. 12:07:33 Q. What were they chanting?                                                                                                           | 21             | Q. Okay. So you were there in your                                                                |
| 20                         | <ul><li>Q. What were they chanting?</li><li>A. I don't recall.</li></ul>                                                                               | 22             | capacity as an editor of the Tribune?                                                             |
| 20<br>21<br>22<br>23       | <ul><li>Q. What were they chanting?</li><li>A. I don't recall.</li><li>Q. Were the demonstrators singing?</li></ul>                                    | 22<br>23       | capacity as an editor of the Tribune?  A. As my capacity as an employee of the                    |
| 20<br>21<br>22<br>23<br>24 | <ul><li>Q. What were they chanting?</li><li>A. I don't recall.</li><li>Q. Were the demonstrators singing?</li><li>A. You know, I don't know.</li></ul> | 22<br>23<br>24 | capacity as an editor of the Tribune?  A. As my capacity as an employee of the News Tribune, yes. |
| 20<br>21<br>22<br>23       | <ul><li>Q. What were they chanting?</li><li>A. I don't recall.</li><li>Q. Were the demonstrators singing?</li></ul>                                    | 22<br>23       | capacity as an editor of the Tribune?  A. As my capacity as an employee of the                    |

|                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                | · · · · · · · · · · · · · · · · · · ·                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| •                                                                                                                         | Page 78                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                | Page 80                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1                                                                                                                         | November 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1                                                                                                                              | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2                                                                                                                         | MR, KESLAR: Objection. That goes to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2                                                                                                                              | Q. Bystanders?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3                                                                                                                         | unpublished information covered by the reporter's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 3                                                                                                                              | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4                                                                                                                         | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 4                                                                                                                              | Q. Anti-protestors?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5                                                                                                                         | You don't have to answer that question, 12:10:45                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                                              | A. Yes. 12:13:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6                                                                                                                         | Q. Did you interview people on November                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 6                                                                                                                              | <ol> <li>So tell me about the anti-protestors.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 7                                                                                                                         | 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 7                                                                                                                              | How many were there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8                                                                                                                         | MR. KESLAR: Again, objection. That                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 8                                                                                                                              | A. It's really impossible for me to say                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9                                                                                                                         | broad of a question goes to the reporter's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9                                                                                                                              | that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10                                                                                                                        | privilege. It's privileged information. You 12:10:59                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 10                                                                                                                             | Q. Okay. 12:13:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 11                                                                                                                        | don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11                                                                                                                             | A. But as far as telling you about the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12                                                                                                                        | <ul> <li>Q. Did you take any pictures on November</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 12                                                                                                                             | anti-protestors, there was a movement that I                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 13                                                                                                                        | 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 13                                                                                                                             | believe was conducted mainly online in response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 14                                                                                                                        | MR. KESLAR: Same objection as stated,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 14                                                                                                                             | to the prior day's demonstrations. They seemed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 15                                                                                                                        | and so you don't have to answer that question, 12:11:06                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 15                                                                                                                             | to be motivated mainly by political divisions at 12:13:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 16                                                                                                                        | pursuant to the First Amendment of the U.S.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 16                                                                                                                             | the time. Folks were going to Gibson's Bakery to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 17                                                                                                                        | Constitution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 17                                                                                                                             | buy items to support the bakery. There were also                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 18                                                                                                                        | <ul> <li>Q. Did you use your cell phone to record</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 18                                                                                                                             | people driving by honking horns, either for or                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 19                                                                                                                        | any audio on November 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 19                                                                                                                             | against, and yelling. I mean, obviously, I can't                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 20                                                                                                                        | MR. KESLAR: Same objection. That broad 12:11:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 20                                                                                                                             | tell whether they were honking their horns for or 12:14:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 21                                                                                                                        | of a question is covered by the reporter's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 21                                                                                                                             | against, but they were accompanied by yells from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 22                                                                                                                        | privilege of the First Amendment of the U.S.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 22                                                                                                                             | cars, some for and some against the demonstrators                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 23                                                                                                                        | Constitution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 23                                                                                                                             | on both sides.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 24                                                                                                                        | You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 24                                                                                                                             | Q. Since you were present on November 11th                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 25                                                                                                                        | Q. Did you use your camera to record any 12:11:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 25                                                                                                                             | and I wasn't at all, what's your best estimate of 12:14:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                           | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | ]                                                                                                                              | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                           | Page 79                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                | Page 81                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1                                                                                                                         | P N. 1. 1140                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                           | audio on November 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1                                                                                                                              | the numbers of people that you saw who seemed to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2                                                                                                                         | audio on November 11th?  MR, KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1 2                                                                                                                            | the numbers of people that you saw who seemed to be opposed to the demonstrations taking place                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2<br>3                                                                                                                    | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1                                                                                                                              | the numbers of people that you saw who seemed to<br>be opposed to the demonstrations taking place<br>there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                           | MR. KESLAR: Same objection. You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2                                                                                                                              | be opposed to the demonstrations taking place there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3                                                                                                                         | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2 3                                                                                                                            | be opposed to the demonstrations taking place                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3<br>4                                                                                                                    | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4                                                                                                                    | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3<br>4<br>5                                                                                                               | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5                                                                                                               | be opposed to the demonstrations taking place<br>there?  MR. KESLAR: Objection. Asked and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3<br>4<br>5<br>6                                                                                                          | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6                                                                                                          | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3<br>4<br>5<br>6<br>7                                                                                                     | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | be opposed to the demonstrations taking place there? MR. KESLAR: Objection. Asked and answered. 12:14:41 If you can answer, go ahead. A. I really can't estimate how many people                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3<br>4<br>5<br>6<br>7<br>8                                                                                                | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  12:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  12:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do?                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  12:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  12:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you  12:14:57                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  12:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you characterize — it sounds like you're saying that                                                                                                                                                                                                                                                                                                                                                                                       |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration.                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  12:14:41  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  12:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you characterize — it sounds like you're saying that there were two groups of demonstrators there.                                                                                                                                                                                                                                                                                                                                         |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you – how would you characterize – it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?                                                                                                                                                                                                                                                                                                            |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there?                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you – how would you characterize – it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both                                                                                                                                                                                                                                                                    |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you characterize — it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to  12:15:12                                                                                                                                                                                                         |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37 Q. Were there administrators there?                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you characterize — it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to 12:15:12 his characterization. It's unpublished                                                                                                                                                                   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37 Q. Were there administrators there? A. I don't know.                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you – how would you 12:14:57 characterize – it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to 12:15:12 his characterization. It's unpublished information. It's protected by the First                                                                                                                 |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37 Q. Were there administrators there? A. I don't know. Q. Faculty members?                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you l2:14:57 characterize — it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to l2:15:12 his characterization. It's unpublished information. It's protected by the First Amendment of the U.S. Constitution.                                                                             |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37 Q. Were there administrators there? A. I don't know. Q. Faculty members? A. I don't know.                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you characterize — it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to 12:15:12 his characterization. It's unpublished information. It's protected by the First Amendment of the U.S. Constitution.  You don't have to answer that question.                                             |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37 Q. Were there administrators there? A. I don't know. Q. Faculty members? A. I don't know. Q. Members of the Oberlin community? 12:12:54 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you – how would you characterize – it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to his characterization. It's unpublished information. It's protected by the First Amendment of the U.S. Constitution.  You don't have to answer that question.  Q. When I use the phrase anti-protestors,  12:15:21 |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | MR. KESLAR: Same objection. You don't have to answer that question. Q. Did you use your camera to record any images, visual, still, or otherwise, on November 12:11:36 11th? MR. KESLAR: That broad of a question, it's the same objection. You don't have to answer that question. Q. Did you walk inside Gibson's Bakery on 12:11:44 November 11th? A. I don't recall. Q. So while you were at the demonstration on November 11th, what did you do? A. Honestly, sir, I don't remember what the 12:12:17 different news-gathering techniques were between the days that I was at the demonstration. Q. Okay. When you were at the protests on November 11th, were there students there? A. Yes. 12:12:37 Q. Were there administrators there? A. I don't know. Q. Faculty members? A. I don't know.                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | be opposed to the demonstrations taking place there?  MR. KESLAR: Objection. Asked and answered.  If you can answer, go ahead.  A. I really can't estimate how many people were involved in both sides.  Q. Okay. But I'm talking about the anti-protestors.  I2:14:48  Now, let's back up. So there were protests there who were opposed to Gibson's Bakery, correct?  A. Opposed to Gibson's Bakery?  Q. Yeah. How would you — how would you characterize — it sounds like you're saying that there were two groups of demonstrators there. How would you characterize both sides?  MR. KESLAR: Objection. It goes to both reporter's privilege and editorial process as to 12:15:12 his characterization. It's unpublished information. It's protected by the First Amendment of the U.S. Constitution.  You don't have to answer that question.                                             |

|                | Page 82                                                 | ]  | Page 84                                                                                      |
|----------------|---------------------------------------------------------|----|----------------------------------------------------------------------------------------------|
| 1              | do you know what I mean?                                | 1  | Q. Speechifying?                                                                             |
| 2              | A. I believe you're talking about people                | 2  | A. Sure. If I get up on my soap box and                                                      |
| 3              | who are there to take an opposite approach from         | 3  | give a speech, regardless of whether someone is                                              |
| 4              | the demonstrators who showed up on the first day.       | 4  | listening. There were people who were there to                                               |
| 5              | Q. Correct. 12:15:27                                    | 5  | be visible, 12:17:32                                                                         |
| 6              | A. Yes.                                                 | 6  | Q. Okay. Speechifying.                                                                       |
| 7              | Q. Okay. Can you give me any estimate as                | 7  | A. Yes.                                                                                      |
| 8              | to the size of the anti-protestors?                     | 8  | Q. Okay. I learned a new word today.                                                         |
| 9              | A. No.                                                  | 9  | That's a verb?                                                                               |
| 10             | Q. Okay. Were there a thousand 12:15:37                 | 10 | A. We can make it one. 12:17:35                                                              |
| 11             | anti-protestors there?                                  | 11 | Q. Okay. I learned a new word today.                                                         |
| 12             | A. The protestors were — or I'm sorry, the              | 12 | Good.                                                                                        |
| 13             | anti-protestors, as you've chosen to call them,         | 13 | A. It's a great thing about the English                                                      |
| 14             | were generally there to support the store by            | 14 | language is that the rules change all the time.                                              |
| 15             | buying things, so they were moving in and out. 12:15:51 | 15 | Q. And there are more words than anyone can 12:17:44                                         |
| 16             | It wasn't a discrete group that was standing on         | 16 | possibly know, I suppose, right?                                                             |
| 17             | the sidewalk.                                           | 17 | A. Yes, sir.                                                                                 |
| 18             | Q. Okay, About how many people did you see              | 18 | Q. Did you recognize anyone who seemed to                                                    |
| 19             | who would make up this group of, as we've now           | 19 | be present in support of Gibson's Bakery?                                                    |
| 20             | called them, anti-protestors? 12:16:03                  | 20 | A. I wouldn't be able to say what their — 12:17:55                                           |
| 21             | A. It's impossible to say.                              | 21 | I wouldn't be able to say what their motivations                                             |
| 22             | Q. Okay. Would you say there were a                     | 22 | Were.                                                                                        |
| 23             | thousand that you saw during the time that you          | 23 |                                                                                              |
| 24             | were there?                                             | 24 | Q. Let's go back. So you've testified that there were people there who wanted to counter the |
| 25             | A. No. 12:16:12                                         | 25 | message of the large group of demonstrators, 12:18:12                                        |
| 2.5            |                                                         | 23 |                                                                                              |
|                | Molnar Reporting Services, LLC (440) 340-6161           |    | Molnar Reporting Services, LLC (440) 340-6161                                                |
|                | Page 83                                                 |    | Page 85                                                                                      |
| 1              | Q. 500?                                                 | 1  | correct?                                                                                     |
| 2              | A. Likely not.                                          | 2  | A. Yes.                                                                                      |
| 3              | Q. Okay, 250?                                           | 3  | Q. Okay. My question is did you identify                                                     |
| 4              | A. It's possible.                                       | 4  | anybody or recognize anyone?                                                                 |
| 5              | Q. Okay. Were any of the individuals who 12:16:27       | 5  | A. Did I recognize any of the people who I 12:18:21                                          |
| 6              | were there to support Gibson's Bakery carrying          | 6  | believe were there specifically to be                                                        |
| 7              | signs?                                                  | 7  | anti-protestors?                                                                             |
| 8              | A. Not that I recall.                                   | 8  | Q. No. Did you recognize - well, let's be                                                    |
| 9              | Q. Did anyone making up that group sing at              | 9  | clear. Did you recognize anyone there who seemed                                             |
| 10             | all? 12:16:46                                           | 10 | to oppose the message of the large group of 12:18:33                                         |
| 11             | A. Again, not that I recall.                            | 11 | roughly 250 people who you said were present?                                                |
| 12             | Q. Was there any chanting by that group?                | 12 | A. I don't remember seeing anyone that I                                                     |
| 13             | A. Organized chants together, no.                       | 13 | identified specifically.                                                                     |
| 14             | Q. Okay. Were there any speeches?                       | 14 | Q. So during the three hours that you were                                                   |
| 15             | A. In the traditional sense that one person 12:17:07    | 15 | at the demonstration, did you see any police 12:18:54                                        |
| 16             | would talk to a large number who were all               | 16 | there?                                                                                       |
| 17             | receiving them at the same time?                        | 17 | A. Well, I didn't say that I was there for                                                   |
| 18             | Q. Yes.                                                 | 18 | three hours.                                                                                 |
| 19             | A. No.                                                  | 19 | Q. I think you testified that you were                                                       |
| 20             | Q. Okay. 12:17:16                                       | 20 | there for about three hours. 12:19:01                                                        |
| 21             | A. I mean, there were definitely people who             | 21 | A. That's incorrect.                                                                         |
| 7.             | were speechifying, but                                  | 22 | MR. KESLAR: Objection. That's a                                                              |
|                | mere apotentijnig, out —                                | 23 | mischaracterization.                                                                         |
| 22             | O I'm sorry There were obviously people                 |    |                                                                                              |
| 22<br>23       | Q. I'm sorry. There were obviously people               |    |                                                                                              |
| 22<br>23<br>24 | who were                                                | 24 | MS. CROCKER: Less than three hours.                                                          |
| 22<br>23       |                                                         |    |                                                                                              |

|                            | Page 86                                                                                                                             |                | Page 88                                                                                                     |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------|----------------|-------------------------------------------------------------------------------------------------------------|
| 1                          | there - so we're clear, you were there for less                                                                                     | 1              | assault anyone?                                                                                             |
| 2                          | than three hours, correct?                                                                                                          | 2              | A. Again, physically?                                                                                       |
| 3                          | A. Yes.                                                                                                                             | 3              | Q. Yes.                                                                                                     |
| 4                          | Q. Okay. Thank you. During that time, did                                                                                           | 4              | A. No.                                                                                                      |
| 5                          | you see any police? 12:19:15                                                                                                        | 5              | Q. So were the demonstrations peaceful on 12:21:21                                                          |
| 6                          | A. Yes.                                                                                                                             | 6              | November 11th?                                                                                              |
| 7                          | Q. Okay. How many officers?                                                                                                         | 7              | MR. KESLAR: Objection. Goes to the                                                                          |
| 8                          | A. I don't know.                                                                                                                    | 8              | editorial process, state of mind. It's covered                                                              |
| 9                          | Q. Can you approximate how many officers                                                                                            | 9              | by the First Amendment of the U.S. Constitution.                                                            |
| 10                         | were there? 12:19:21                                                                                                                | 10             | You don't have to answer that question. 12:21:34                                                            |
| 11                         | A. No.                                                                                                                              | 11             | Q. Did the demonstrators allow shoppers to                                                                  |
| 12                         | Q. What were the police doing?                                                                                                      | 12             | walk inside and walk back out of Gibson's Bakery?                                                           |
| 13                         | A. The ones that I saw were driving by.                                                                                             | 13<br>14       | A. Yes.                                                                                                     |
| 14<br>15                   | Q. Okay. Were there – strike that.  The demonstrations that were going on, 12:19:33                                                 | 15             | Q. Did the demonstrators allow shoppers to have ingress to Gibson's Bakery? 12:21:54                        |
| 16                         | those took place on the sidewalk?                                                                                                   | 16             | A. Yes.                                                                                                     |
| 17                         | A. Yes.                                                                                                                             | 17             | Q. Egress to Gibson's, or from Gibson's                                                                     |
| 18                         | Q. Did you see any police officers on the                                                                                           | 18             | Bakery?                                                                                                     |
| 19                         | sidewalk that day?                                                                                                                  | 19             | A. Yes.                                                                                                     |
| 20                         | A. Not that I recall. The ones I saw were 12:19:45                                                                                  | 20             | Q. Did you see any of the protestors break 12:22:11                                                         |
| 21                         | in patrol cars.                                                                                                                     | 21             | the law?                                                                                                    |
| 22                         | Q. And how many individuals were in                                                                                                 | 22             | MR. KESLAR: Objection. Foundation as                                                                        |
| 23                         | those – strike that.                                                                                                                | 23             | to his legal qualifications.                                                                                |
| 24                         | As you saw the various patrol cars, were                                                                                            | 24             | But to the extent you can answer, go                                                                        |
| 25                         | these cars with one or two individuals inside? 12:19:56                                                                             | 25             | ahead. 12:22:27                                                                                             |
|                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                       |                | Molnar Reporting Services, LLC (440) 340-6161                                                               |
|                            | Page 87                                                                                                                             |                | Page 89                                                                                                     |
| 1                          | A. I don't know.                                                                                                                    | 1              | A. I was going to recommend that you talk                                                                   |
| 2                          | Q. Did you see any violence on November                                                                                             | 2              | to a legal professional about that.                                                                         |
| 3                          | 11th?                                                                                                                               | 3              | Q. Okay. No one was arrested, correct?                                                                      |
| 4                          | A. When you say "violence," you're                                                                                                  | 4              | A. I didn't see anyone be arrested.                                                                         |
| 5                          | characterizing it as physical violence? 12:20:15                                                                                    | 5              | Q. Okay. That's my question. 12:22:40                                                                       |
| 6                          | Q. Correct.                                                                                                                         | 6              | Did you see anyone get arrested on                                                                          |
| 7                          | A. No.                                                                                                                              | 7              | November 11th?                                                                                              |
| В                          | Q. Did you see any property damage?                                                                                                 | 8              | A. No.                                                                                                      |
| 9                          | A. Not intentional, no.                                                                                                             | 9              | Q. Did you call the police on November                                                                      |
| 10                         | Q. Did you see any of the protestors engage 12:20:29                                                                                | 10             | 11th? 12:22:50                                                                                              |
| 11                         | in any violence?                                                                                                                    | 11             | A. I don't know.                                                                                            |
| 12                         | A. Again, physical?                                                                                                                 | 12             | Q. Okay. You're not sure?                                                                                   |
| 13                         | Q. Yes.                                                                                                                             | 13             | A. I frequently call a lot of people. I'm                                                                   |
| 14                         | A. No.                                                                                                                              | 14             | not sure who I called that day.                                                                             |
| 15                         | Q. Did you see any of the protestors damage 12:20:39                                                                                | 15             | Q. Okay. Did you call the police at the 12:23:00                                                            |
| 16<br>17                   | any property?                                                                                                                       | 16<br>17       | demonstration because you felt that you were in fear of physical harm or physical injury?                   |
| 17<br>18                   | A. I don't recall seeing anybody intentionally damage any property.                                                                 | 18             | MR. KESLAR: Objection. Again, it goes                                                                       |
|                            | Q. Did you see the protestors break any                                                                                             | 19             | right to the state of mind. It's protected by                                                               |
|                            |                                                                                                                                     | ſ              | the First Amendment. 12:23:14                                                                               |
| 19                         |                                                                                                                                     | 1 /11          |                                                                                                             |
| 19<br>20                   | windows at Gibson's Bakery? 12:21:03                                                                                                | 20             |                                                                                                             |
| 19<br>20<br>21             | windows at Gibson's Bakery? 12:21:03  A. No.                                                                                        | 21             | You don't have to answer that.                                                                              |
| 19<br>20<br>21<br>22       | windows at Gibson's Bakery? 12:21:03  A. No. Q. Did you see the protestors break any                                                | 21<br>22       | You don't have to answer that. Q. Did you talk to any of the police                                         |
| 19<br>20<br>21<br>22<br>23 | windows at Gibson's Bakery? 12:21:03  A. No. Q. Did you see the protestors break any windows of any of the surrounding storefronts? | 21             | You don't have to answer that.  Q. Did you talk to any of the police officers who were driving by that day? |
| 19<br>20<br>21<br>22       | windows at Gibson's Bakery? 12:21:03  A. No. Q. Did you see the protestors break any                                                | 21<br>22<br>23 | You don't have to answer that. Q. Did you talk to any of the police                                         |

| Page 90 that day on November 11th? MR. KESLAR: Goes to an undisclosed                  | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Page 92<br>A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| -                                                                                      | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| MR. KESLAR: Goes to an undisclosed                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                        | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. You would agree with me, right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| source. Unpublished information is protected by                                        | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| the First Amendment.                                                                   | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. And some have characterized it as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| You don't have to answer that question. 12:23:39                                       | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | a shoplifting incident, correct? 12:25:36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | A. That's how it was characterized at                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| · · ·                                                                                  | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | first, yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                        | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. And some may characterize it in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                        | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | some other way, correct? A. Yes. 12:25:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. But the incident at its core involved an                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Oberlin student who came into the store and tried                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                        | · ·                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | to take wine out of the store. Agree?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. Were you present when that 12:25:57                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                        | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | incident occurred, again, on November 9, 2016?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                        | 17                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                        | 18                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Q. Do you have any personal knowledge of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                        | 19                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | what took place during that incident?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| A. Demonstrators. 12:24:14                                                             | 20                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. No. 12:26:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Q. Had the size of the crowd increased or                                              | 21                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Q. Okay. So would you agree that anything                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| stayed the same or decreased?                                                          | 22                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | that you know about the incident is something                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| A. I don't recall.                                                                     | 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | that you learned from talking to other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <ul><li>Q. Okay. So were you present when the –</li></ul>                              | 24                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | individuals? Agree?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                        | 25                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. No. 12:26:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Molnar Reporting Services, LLC (440) 340-6161                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Page 91                                                                                | <del></del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Page 93                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| You've confirmed that there was a                                                      | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. And why do you disagree with me?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| incident that occurred at Gibson's Bakery on                                           | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | A. It would have also been informed by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| November 9, 2016, correct?                                                             | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | public documents.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| A. Again, if that's the date on the police                                             | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. So let's go back.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| report, then yes. 12:24:57                                                             | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | So you have no personal knowledge of 12:26:37                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Q. Yes, and it is. And I'll represent to                                               | 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | what transpired on November 9, 2016, inside                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| you that that was the date where there was a                                           | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Gibson's Bakery, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                        | 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <ol> <li>I have no firsthand knowledge.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| • •                                                                                    | _                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Yes. You have no firsthand knowledge,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| ·                                                                                      | 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | right? 12:26:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | A. Correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. And you have no personal knowledge,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                        | Į.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | A. Well, firsthand.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. Okay. You have no firsthand knowledge 12:26:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | because you were not actually in the store,<br>correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                        | l                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | A. Correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Q. Okay. You have no idea from a firsthand                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                        | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | perspective what happened in the store, correct? 12:27:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| · -                                                                                    | 21                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. Yes, that's correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                        | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Q. And you have no idea what didn't happen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| A. Okay.                                                                               | 23                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | in the store from a firsthand perspective, right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                        | 24                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| O. SO THE WAS ALL HICHGELL THAT THOSE DIAGE                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Q. So there was an incident that took place at Gibson's Bakery on November 9? 12:25:29 | 25                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. I can't confirm logical fallacies, no. 12:27:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                        | A. Demonstrators. 12:24:14  Q. Had the size of the crowd increased or stayed the same or decreased?  A. I don't recall.  Q. Okay. So were you present when the — strike that. 12:24:45  Molnar Reporting Services, LLC (440) 340-6161  Page 91  You've confirmed that there was a incident that occurred at Gibson's Bakery on November 9, 2016, correct?  A. Again, if that's the date on the police report, then yes. 12:24:57  Q. Yes, and it is. And I'll represent to | at the demonstration, you left, correct?  A. Yes.  Q. Where did you go?  A. Back to the office.  Q. Okay. And for how long did you stay at the office?  A. I don't know.  Q. Okay. About what time did you – strike that.  Did you go back out to the demonstration a second time?  A. I believe I drove by it on the way home.  Q. What did you see as you were driving by?  A. Demonstrators.  Q. Had the size of the crowd increased or stayed the same or decreased?  A. I don't recall.  Q. Okay. So were you present when the – strike that.  12:24:45  Molnar Reporting Services, LLC (440) 340-6161  Page 91  You've confirmed that there was a incident that occurred at Gibson's Bakery on November 9, 2016, correct?  A. Again, if that's the date on the police report, then yes.  Q. Yes, and it is. And I'll represent to you that that was the date where there was a shoplifting incident that occurred at Gibson's Bakery on R. Again, if that's the date on the police report, then yes.  Q. Yes, and it is. And I'll represent to you that that was the date where there was a shoplifting incident that occurred at Gibson's Bakery, okay?  A. No, I don't believe so.  MR. KESLAR: It wasn't a question. He was just – he wants you to assume that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purposes of these questions, he said he's going to represent that that's the date. For the purpose of these questions, he said he's going to represent that that |

|                                                                                       | Page 94                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                            | Page 96                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                     | MR. HOLMAN: Could you read back the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 1                                                                                          | either gentleman?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2                                                                                     | question and the answer, please?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2                                                                                          | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3                                                                                     | (Record read.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3                                                                                          | <ul> <li>Q. Okay. So your relationship is solely</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4                                                                                     | MR. HOLMAN: Could you read back the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 4                                                                                          | professional?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5                                                                                     | answer one more time, please?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 5                                                                                          | A. Correct. 12:48:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6                                                                                     | (Record read.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 6                                                                                          | Q. Okay. Is there anyone else that you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7                                                                                     | <ul> <li>Q. So you did not personally observe the</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7                                                                                          | know by name at the Oberlin Police Department?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8                                                                                     | incident that occurred at Gibson's Bakery on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 8                                                                                          | A. Yes,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9                                                                                     | November 9, 2016, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9                                                                                          | Q. Okay. Who is that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10                                                                                    | A. That's correct. 12:28:09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 10                                                                                         | A. Billie Neadham. 12:48:36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 11                                                                                    | <ul> <li>Q. Okay. And is it your testimony today</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 11                                                                                         | Q. Who is he?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 12                                                                                    | that everything that you know about what, in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 12                                                                                         | <ul> <li>A. He's typically assigned as the school</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 13                                                                                    | fact, happened during that incident came from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 13                                                                                         | resource officer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 14                                                                                    | public records and conversations you've had with                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 14                                                                                         | Q. Which school does he work at?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 15                                                                                    | individuals? 12:28:30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 15                                                                                         | A. To the best of my knowledge, he rotates 12:48:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 16                                                                                    | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 16                                                                                         | through all of them.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 17                                                                                    | MR. HOLMAN: Okay. Oh, we have just a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 17                                                                                         | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 18                                                                                    | few minutes left on the tape, so why don't we go                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 18                                                                                         | A. In the Oberlin City Schools.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 19                                                                                    | off the record and allow our videographer to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 19                                                                                         | Q. So other than Henry, Mike, and Billie,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 20                                                                                    | change tapes, if that's okay. 12:28:50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 20                                                                                         | do you know the names of any other police 12:49:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 21                                                                                    | VIDEOGRAPHER: Off the record, 12:28.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 21                                                                                         | officers from Oberlin?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 22                                                                                    | (Recess taken.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 22                                                                                         | A. I would recognize them, but off the top                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 23                                                                                    | MR. HOLMAN: So let's go back on the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 23                                                                                         | of my head, I wouldn't be able to list anyone                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 24                                                                                    | record.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 24                                                                                         | else on the roster.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 25                                                                                    | VIDEOGRAPHER: On the record, 12:46. 12:47:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 25                                                                                         | Q. Okay. And do you know Billie 12:49:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                                                                     | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                       | Page 95                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | ;                                                                                          | Page 97                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                       | Page 95                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                            | Page 97                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1                                                                                     | Q. So you were testifying earlier that when                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1                                                                                          | personally?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2                                                                                     | you were at the demonstration on November 11th,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2                                                                                          | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3                                                                                     | you saw various cruisers driving by, right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3                                                                                          | Q. Okay. You testified before, Mr. Hawk,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4                                                                                     | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4                                                                                          | that your knowledge of the incident on November 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5                                                                                     | Q. Did you recognize anyone? 12:47:31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 5                                                                                          | came in part from police documents. Do you 12:49:24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6                                                                                     | A. You mean as far as in the police                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6                                                                                          | recall saying that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 7                                                                                     | cruisers?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1 7                                                                                        | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8                                                                                     | Q. I'm sorry, yes. Do you – did you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 8                                                                                          | Q. Who gave you those police documents?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9                                                                                     | recognize any of the police officers?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 8<br>9                                                                                     | Q. Who gave you those police documents? MR. KESLAR: Objection. It goes to both                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 9<br>10                                                                               | recognize any of the police officers?  A. No. 12:47:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 8<br>9<br>10                                                                               | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9<br>10<br>11                                                                         | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 8<br>9<br>10<br>11                                                                         | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9<br>10<br>11<br>12                                                                   | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?                                                                                                                                                                                                                                                                                                                                                                                                                      | 8<br>9<br>10<br>11<br>12                                                                   | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9<br>10<br>11                                                                         | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.                                                                                                                                                                                                                                                                                                                                                                                                      | 8<br>9<br>10<br>11<br>12<br>13                                                             | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.                                                                                                                                                                                                                                                                                                                                                                                   |
| 9<br>10<br>11<br>12                                                                   | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?                                                                                                                                                                                                                                                                                                                                                                          | 8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?                                                                                                                                                                                                                                                                                                                                         |
| 9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49                                                                                                                                                                                                                                                                                                                     | 8 9 10 11 12 13 14 15                                                                      | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment. You don't have to answer that. Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the 12:49:56                                                                                                                                                                                                                                                                                          |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different                                                                                                                                                                                                                                                                    | 8 9 10 11 12 13 14 15 16                                                                   | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the same question another way. It goes at least to                                                                                                                                                                                                                                                  |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace,                                                                                                                                                                                                                      | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial process. It's privileged information under the U.S. Constitution First Amendment. You don't have to answer that. Q. Were the police reports given to you? MR. KESLAR: Objection. It's really the same question another way. It goes at least to the same subject matter that's privileged.                                                                                                                                                                                                                   |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which Im 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two                                                                                                                                                                         | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the same question another way. It goes at least to the same subject matter that's privileged.  You don't have to answer that.                                                                                                                                                                       |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin                                                                                                                      | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the same question another way. It goes at least to the same subject matter that's privileged.  You don't have to answer that.  Q. Moments ago, we talked about contacts                                                                                                                             |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin Police Department. 12:48:14                                                                                          | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the same question another way. It goes at least to the same subject matter that's privileged.  You don't have to answer that.                                                                                                                                                                       |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin                                                                                                                      | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the same question another way. It goes at least to the same subject matter that's privileged.  You don't have to answer that.  Q. Moments ago, we talked about contacts                                                                                                                             |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin Police Department. 12:48:14                                                                                          | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the 12:49:56 same question another way. It goes at least to the same subject matter that's privileged.  You don't have to answer that.  Q. Moments ago, we talked about contacts that you have with the Oberlin Police Department, 12:50:09                                                         |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin Police Department. 12:48:14  Q. Okay. How often do you talk to them?                                                 | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment. You don't have to answer that. Q. Were the police reports given to you? MR. KESLAR: Objection. It's really the 12:49:56 same question another way. It goes at least to the same subject matter that's privileged. You don't have to answer that. Q. Moments ago, we talked about contacts that you have with the Oberlin Police Department, 12:50:09 right?                                                       |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin Police Department. 12:48:14  Q. Okay. How often do you talk to them?  A. It varies.                                  | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment. You don't have to answer that. Q. Were the police reports given to you? MR. KESLAR: Objection. It's really the 12:49:56 same question another way. It goes at least to the same subject matter that's privileged. You don't have to answer that. Q. Moments ago, we talked about contacts that you have with the Oberlin Police Department, 12:50:09 right? A. Yes.                                               |
| 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | recognize any of the police officers?  A. No. 12:47:41  Q. Do you know people who work at the Oberlin Police Department?  A. A few, yes.  Q. Which ones do you know?  A. The captain of the auxiliary, which I'm 12:47:49 sure that he would take his – he has a different title that he uses. I'm sorry. Henry Wallace, the Captain. Mike McCloskey. Those are my two primary folks that I interact with at the Oberlin Police Department. 12:48:14  Q. Okay. How often do you talk to them?  A. It varies.  Q. Do you know them personally? | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q. Who gave you those police documents?  MR. KESLAR: Objection. It goes to both the source and it's covered by the editorial 12:49:38 process. It's privileged information under the U.S. Constitution First Amendment.  You don't have to answer that.  Q. Were the police reports given to you?  MR. KESLAR: Objection. It's really the 12:49:56 same question another way. It goes at least to the same subject matter that's privileged.  You don't have to answer that.  Q. Moments ago, we talked about contacts that you have with the Oberlin Police Department, 12:50:09 right?  A. Yes.  Q. Do you have contacts with anyone at |

| j        |                                                                                        | <del></del> |                                                                                        |
|----------|----------------------------------------------------------------------------------------|-------------|----------------------------------------------------------------------------------------|
|          | Page 98                                                                                |             | Page 100                                                                               |
| 1        | Q. Okay. Who would your contacts be?                                                   | 1           | A. She's usually a backup.                                                             |
| 2        | A. The media liaison is Scott Wargo.                                                   | 2           | Q. Okay. When you speak to Scott, is it                                                |
| 3        | Q. Anyone else?                                                                        | 3           | usually on the phone or in person?                                                     |
| 4        | A. I'm familiar with Amanda Nagy, who also                                             | 4           | A. It's been mainly on the phone.                                                      |
| 5        | works under Scott. 12:50:38                                                            | 5           | Q. Okay. What with – what about with 12:53:04                                          |
| 6        | Q. Anyone else?                                                                        | 6           | Amanda?                                                                                |
| 7        | A. Typically, our queries go through those,                                            | 7           | A. It's infrequent enough that there's not                                             |
| 8        | through the media office.                                                              | 8           | really a pattern there.                                                                |
| 9        | Q. Okay. Do you know who Ben Jones is?                                                 | 9           | Q. Okay.                                                                               |
| 10       | A. Off the top of my head, no. 12:50:53                                                | 10<br>11    | A. With the exception of e-mails that she 12:53:17                                     |
| 11<br>12 | Q. Okay. So most of your contacts                                                      | 12          | sends out on behalf of the college as press releases for wide release.                 |
| 13       | involving Oberlin would go through either Scott Wargo or Amanda Nagy?                  | 13          | MR. HOLMAN: Okay. Oh, you know, I                                                      |
| 14       | MR. KESLAR: Objection. That question                                                   | 14          | forgot to ring in Dr. Raimondo, so let me do that                                      |
| 15       | as phrased goes to reporter's privilege and asks 12:51:06                              | 15          | here. 12:53:34                                                                         |
| 16       | for sources of information that are potentially                                        | 16          | I'll try again in just a second here.                                                  |
| 17       | undisclosed in these articles that we're here                                          | 17          | Q. You would agree with me there is a                                                  |
| 18       | about. It's protected by the First Amendment                                           | 18          | parking lot in back of Gibson's Bakery, correct?                                       |
| 19       | privilege.                                                                             | 19          | A. Yes.                                                                                |
| 20       | You don't have to answer. 12:51:18                                                     | 20          | Q. Okay. Has that parking lot been there 12:54:21                                      |
| 21       | MR. HOLMAN: Right. And so the record                                                   | 21          | during the time that you've worked as a reporter                                       |
| 22       | is clear for the context of my questions, the                                          | 22          | or editor at the paper?                                                                |
| 23       | individuals that Mr. Hawk has just identified are                                      | 23          | A. Yes.                                                                                |
| 24       | Oberlin people, they are Oberlin employees, and                                        | 24          | Q. Do you ever park in that parking lot?                                               |
| 25       | so I don't think there's any privilege that would 12:51:47                             | 25          | A. No. 12:54:35                                                                        |
|          | Molnar Reporting Services, LLC (440) 340-6161                                          |             | Molnar Reporting Services, LLC (440) 340-6161                                          |
|          | <u> </u>                                                                               |             |                                                                                        |
|          | Page 99                                                                                |             | Page 101                                                                               |
| 1        | attach to him identifying these Oberlin                                                | 1           | Q. Do you know of individuals who do park                                              |
| 2        | individuals or answering questions about his                                           | 2           | in that parking lot?                                                                   |
| 3        | contacts with these Oberlin individuals.                                               | 3           | A. No.                                                                                 |
| 4        | MR. KESLAR: And I would disagree on a                                                  | 4           | <ol> <li>Q. Have you ever seen any – strike that.</li> </ol>                           |
| 5        | couple bases, one of which is they're an 12:52:04                                      | 5           | Have you ever heard of complaints about 12:54:48                                       |
| 6        | alternative readily available source that they                                         | 6           | the accessibility of parking spaces in that                                            |
| 7        | can provide the same information. You don't need                                       | 7           | parking lot?                                                                           |
| 8        | to invade his privilege to obtain that                                                 | 8           | A. Parking availability is a general                                                   |
| 9        | information. And your question asks — it's                                             | 10          | concern that people have in Oberlin, yes.                                              |
| 10       | broad enough that it asks about potential 12:52:15                                     | 10<br>11    | Q. Okay. Have you had conversations with 12:55:07                                      |
| 11<br>12 | information that they might have given him for both these articles and other articles. | 12          | people who are concerned about parking<br>availability in this particular parking lot? |
| 13       | MR, HOLMAN: But I haven't even asked –                                                 | 13          | MR. KESLAR: Objection. That goes to                                                    |
| 14       | I haven't asked a question about what information                                      | 14          | unpublished information. It's readily available                                        |
| 15       | they gave to him yet. 12:52:27                                                         | 15          | from other sources. It's protected by the First 12:55:26                               |
| 16       | MR. KESLAR: Whether they gave him                                                      | 16          | Amendment of the U.S. Constitution.                                                    |
| 17       | information or not is itself privileged.                                               | 17          | You don't have to answer that,                                                         |
| 18       | Q. How often do you have contact with Scott                                            | 18          | Q. Have people criticized parking                                                      |
| 19       | Wargo?                                                                                 | 19          | availability in the parking lot in the back of                                         |
| 20       | A. Infrequently. 12:52:38                                                              | 20          | Gibson's Bakery? 12:55:43                                                              |
|          | Q. What does that mean?                                                                | 21          | MR. KESLAR: Same objection, and I'll                                                   |
| 21       |                                                                                        | 22          | instruct you not to answer.                                                            |
| 21<br>22 | A. A few times a year, maybe.                                                          |             | · · · · · · · · · · · · · · · · · · ·                                                  |
|          | A. A few times a year, maybe. Q. What about Amanda Nagy?                               | 23          | Q. Have you ever seen any construction                                                 |
| 22       |                                                                                        | 23<br>24    | Q. Have you ever seen any construction vehicles in that parking lot?                   |
| 22<br>23 | Q. What about Amanda Nagy?                                                             | 1           |                                                                                        |

|                                              | Page 102                                                                                                                                                                                                                                                       |                            | Page 104                                                                                                                                                             |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                            | Q. Okay. What types of vehicles?                                                                                                                                                                                                                               | 1                          | Q. Do any of your colleagues at the                                                                                                                                  |
| 2                                            | A. I don't know.                                                                                                                                                                                                                                               | 2                          | newspaper park in the lot?                                                                                                                                           |
| 3                                            | Q. Okay. When did you see those vehicles?                                                                                                                                                                                                                      | 3                          | A. Not to my knowledge.                                                                                                                                              |
| 4                                            | Primarily in and around construction of                                                                                                                                                                                                                        | 4                          | Q. Do you know anyone who parks in the lot?                                                                                                                          |
| 5                                            | the Kohl Jazz building. 12:56:09                                                                                                                                                                                                                               | 5                          | A. Specifically? 12:58:35                                                                                                                                            |
| 6                                            | Q. When did that take place?                                                                                                                                                                                                                                   | 6                          | Q. Yes.                                                                                                                                                              |
| 7                                            | A. I don't know off the top of my head.                                                                                                                                                                                                                        | 7                          | A. No.                                                                                                                                                               |
| 8                                            | Q. Can you approximate for me what year                                                                                                                                                                                                                        | 8                          | MR. HOLMAN: Okay. Are you there?                                                                                                                                     |
| 9                                            | that would have been?                                                                                                                                                                                                                                          | 9                          | Helio? He's not there,                                                                                                                                               |
| 10                                           | A. It's in the last ten years. 12:56:18                                                                                                                                                                                                                        | 10                         | MS. CROCKER: I'll step outside one 12:58:48                                                                                                                          |
| 11                                           | MR. HOLMAN: Okay. Heilo, Doctor.                                                                                                                                                                                                                               | 11                         | second,                                                                                                                                                              |
| 12                                           | Excuse me. Let's go off the record for a second.                                                                                                                                                                                                               | 12                         | MR. HOLMAN: Okay. Sure.                                                                                                                                              |
| 13<br>14                                     | VIDEOGRAPHER: Off the record, 12:55. (Discussion off record.)                                                                                                                                                                                                  | 14                         | (Whereupon, Ms. Crocker left the conference room.)                                                                                                                   |
| 15                                           | (Whereupon, Mr. Gibson left the 12:56:34                                                                                                                                                                                                                       | 15                         | Q. Going back to the protest on November 12:59:24                                                                                                                    |
| 16                                           | conference room.)                                                                                                                                                                                                                                              | 16                         | 11th, did you see any other members of the media                                                                                                                     |
| 17                                           | VIDEOGRAPHER: On the record, 12:56.                                                                                                                                                                                                                            | 17                         | there?                                                                                                                                                               |
| 18                                           | Q. Can you describe for me the construction                                                                                                                                                                                                                    | 18                         | MR. KESLAR: Objection. That goes to                                                                                                                                  |
| 19                                           | vehicles that you have seen in the parking lot?                                                                                                                                                                                                                | 19                         | the reporter's privilege. First Amendment.                                                                                                                           |
| 20                                           | A. No. 12:57:07                                                                                                                                                                                                                                                | 20                         | You don't have to answer that. 12:59:39                                                                                                                              |
| 21                                           | Q. Are these trucks or are these actual                                                                                                                                                                                                                        | 21                         | Q. Did you recognize any other members of                                                                                                                            |
| 22                                           | construction vehicles?                                                                                                                                                                                                                                         | 22                         | the media at the protest on November 11?                                                                                                                             |
| 23                                           | A. I recall there being yellow construction                                                                                                                                                                                                                    | 23                         | MR. KESLAR: It's the same question.                                                                                                                                  |
| 24                                           | vehicles, but I'm not an expert on what kind they                                                                                                                                                                                                              | 24                         | Calls for the same privileged information.                                                                                                                           |
| 25                                           | are. 12:57:24                                                                                                                                                                                                                                                  | 25                         | You don't have to answer that. 12:59:54                                                                                                                              |
|                                              | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                  |                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                        |
|                                              | Page 103                                                                                                                                                                                                                                                       |                            | Page 105                                                                                                                                                             |
| 1                                            | Q. Okay. Do you recall for what period of                                                                                                                                                                                                                      | 1                          | Q. Did you see anyone that you knew at the                                                                                                                           |
| 2                                            | time you saw these yellow vehicles there?                                                                                                                                                                                                                      | 2                          | protest on November 11? Again, that was Friday.                                                                                                                      |
| 3                                            | A. No. Other than to say during the                                                                                                                                                                                                                            | 3                          | A. It's possible, but I don't recall                                                                                                                                 |
| 4                                            | construction of the Kohl Jazz building.                                                                                                                                                                                                                        | 4                          | whether the person I saw was there on the 11th or                                                                                                                    |
| . 5                                          | (Whereupon, Mr. Gibson entered the 12:57:32                                                                                                                                                                                                                    | 5                          | the 10th. 13:00:19                                                                                                                                                   |
| 6                                            | conference room.)                                                                                                                                                                                                                                              | 6                          | Q. Okay. Would you agree with me that                                                                                                                                |
| 7                                            | <ul> <li>Q. Do you have any idea what's charged –</li> </ul>                                                                                                                                                                                                   | 7                          | there were criminal proceedings involving the                                                                                                                        |
| 8                                            | what's charged - strike that.                                                                                                                                                                                                                                  | 8                          | three Oberlin students who were accused, among                                                                                                                       |
| 9                                            | Do you know how much money - strike                                                                                                                                                                                                                            | 9                          | other things, of shoplifting?                                                                                                                                        |
| 10                                           | that. 12:57:51                                                                                                                                                                                                                                                 | 10                         | A. Yes. 13:00:37                                                                                                                                                     |
| 11                                           | Do you know what it costs to park in the                                                                                                                                                                                                                       | 11                         | Q. Okay. Did you attend any of the                                                                                                                                   |
| 12                                           | parking lot?                                                                                                                                                                                                                                                   | 12                         | criminal proceedings?                                                                                                                                                |
| 13                                           | A. I don't have that at my disposal right                                                                                                                                                                                                                      | 13                         | A. No.                                                                                                                                                               |
| 14                                           | now.                                                                                                                                                                                                                                                           | 14                         | Q. Do you know if any of your colleagues at                                                                                                                          |
| 15                                           | Q. Okay. Have you ever known what it costs 12:57:59                                                                                                                                                                                                            | 15                         | the Tribune attended any of the proceedings? 13:00:48                                                                                                                |
|                                              | to park in the parking lot?  A. Yes, I've had those numbers.                                                                                                                                                                                                   | 16                         | MR. KESLAR: Objection. That goes to                                                                                                                                  |
| 16                                           | A Yes The had those himbers                                                                                                                                                                                                                                    | 17                         | the editorial process.                                                                                                                                               |
| 17                                           |                                                                                                                                                                                                                                                                | 18                         | You don't have to answer that question.                                                                                                                              |
| 17<br>18                                     | Q. Okay. And what's your understanding of                                                                                                                                                                                                                      | 7.0                        | It's meatacted by the Limit Amandment to the LLN                                                                                                                     |
| 17<br>18<br>19                               | Q. Okay. And what's your understanding of what's been charged?                                                                                                                                                                                                 | 19                         | It's protected by the First Amendment to the U.S.                                                                                                                    |
| 17<br>18<br>19<br>20                         | <ul><li>Q. Okay. And what's your understanding of what's been charged?</li><li>A. I don't have those figures in front of 12:58:09</li></ul>                                                                                                                    | 20                         | Constitution. 13:00:56                                                                                                                                               |
| 17<br>18<br>19<br>20<br>21                   | <ul><li>Q. Okay. And what's your understanding of what's been charged?</li><li>A. I don't have those figures in front of 12:58:09 me.</li></ul>                                                                                                                | 20<br>21                   | Constitution. 13:00:56 Q. Do you know whether the Tribune covered                                                                                                    |
| 17<br>18<br>19<br>20<br>21<br>22             | <ul> <li>Q. Okay. And what's your understanding of what's been charged?</li> <li>A. I don't have those figures in front of 12:58:09 me.</li> <li>Q. Okay. Do you know who owns the parking</li> </ul>                                                          | 20<br>21<br>22             | Constitution. 13:00:56 Q. Do you know whether the Tribune covered at all the criminal proceedings involving the                                                      |
| 17<br>18<br>19<br>20<br>21<br>22<br>23       | <ul> <li>Q. Okay. And what's your understanding of what's been charged?</li> <li>A. I don't have those figures in front of 12:58:09 me.</li> <li>Q. Okay. Do you know who owns the parking lot?</li> </ul>                                                     | 20<br>21<br>22<br>23       | Constitution. 13:00:56 Q. Do you know whether the Tribune covered at all the criminal proceedings involving the three students?                                      |
| 17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | <ul> <li>Q. Okay. And what's your understanding of what's been charged?</li> <li>A. I don't have those figures in front of 12:58:09 me.</li> <li>Q. Okay. Do you know who owns the parking lot?</li> <li>A. I remember having that information, but</li> </ul> | 20<br>21<br>22<br>23<br>24 | Constitution. 13:00:56  Q. Do you know whether the Tribune covered at all the criminal proceedings involving the three students?  MR. KESLAR: That again goes to the |
| 17<br>18<br>19<br>20<br>21<br>22<br>23       | <ul> <li>Q. Okay. And what's your understanding of what's been charged?</li> <li>A. I don't have those figures in front of 12:58:09 me.</li> <li>Q. Okay. Do you know who owns the parking lot?</li> </ul>                                                     | 20<br>21<br>22<br>23       | Constitution. 13:00:56 Q. Do you know whether the Tribune covered at all the criminal proceedings involving the three students?                                      |

|                                                                                                                          | Page 106                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                | Page 108                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                        | You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                                                              | madam court reporter to do that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2                                                                                                                        | Q. Did the Oberlin News Tribune publish any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2                                                                                                                              | (Record read.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3                                                                                                                        | articles that discuss the criminal proceedings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3                                                                                                                              | <ul> <li>A. Due to the break and after confirming</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 4                                                                                                                        | involving the three students?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 4                                                                                                                              | with Mr. Keslar, I did have a chance to recall                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 5                                                                                                                        | A. Yes. 13:01:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 5                                                                                                                              | the name of the reporter that was reporting on 13:14:36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 6                                                                                                                        | <ul> <li>Q. Do you know how many articles discuss</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 6                                                                                                                              | some of those stories.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7                                                                                                                        | the criminal proceedings?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7                                                                                                                              | Q. Okay. Who was that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 8                                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 8                                                                                                                              | A. Evan Goodenow.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9                                                                                                                        | <ul><li>Q. Do you know the reporter who – strike</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 9                                                                                                                              | Q. How do you spell his last name?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 10                                                                                                                       | that. 13:01:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 10                                                                                                                             | A. G-E, I'm sorry, G-O-O-D-E-N-O-W, if 13:14:46                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 11                                                                                                                       | Do you know the name of the reporter                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 11                                                                                                                             | memory serves.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 12                                                                                                                       | whose byline appeared on the Tribune's newspaper                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 12                                                                                                                             | Q. Is he the only reporter from the Tribune                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 13                                                                                                                       | articles which discuss the criminal proceedings?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 13                                                                                                                             | who reported on the criminal proceedings in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 14                                                                                                                       | (Whereupon, Ms. Crocker entered the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 14                                                                                                                             | various newspaper articles?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 15                                                                                                                       | conference room.) 13:01:55                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 15                                                                                                                             | A. That, I can't recall, but I did recall 13:15:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 16                                                                                                                       | A. I would have to look at our records and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 16                                                                                                                             | that he was reporting on some of them.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 17                                                                                                                       | see what bylines appeared.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 17                                                                                                                             | <ul> <li>Q. Okay. You've also testified that you</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 18                                                                                                                       | Q. Okay. So you don't you don't                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 18                                                                                                                             | were aware of demonstrations that took place                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 19                                                                                                                       | remember?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 19                                                                                                                             | around Gibson's Bakery on Thursday, November                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 20                                                                                                                       | A. No. 13:02:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 20                                                                                                                             | 10th, 2016, correct? 13:15:15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 21                                                                                                                       | <ul> <li>Q. Okay. And you can't testify here today,</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 21                                                                                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 22                                                                                                                       | correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 22                                                                                                                             | Q. When did you first become aware that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 23                                                                                                                       | MS. CROCKER: Can you talk? Is there -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 23                                                                                                                             | there were demonstrations taking place outside                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 24                                                                                                                       | MR. HOLMAN: Yes, we can go off the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 24                                                                                                                             | the bakery that day?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 25                                                                                                                       | record. Go off the record, yes. 13:02:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 25                                                                                                                             | MR. KESLAR: Which day? 13:15:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                          | Page 107                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                | D 100                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                | Page 109                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1                                                                                                                        | VIDEOGRAPHER: Off the record, 1:01.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 1                                                                                                                              | MR. HOLMAN: Thursday, November 10th,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1<br>2                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1<br>2                                                                                                                         | _                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                          | VIDEOGRAPHER: Off the record, 1:01.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | l                                                                                                                              | MR. HOLMAN: Thursday, November 10th,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2                                                                                                                        | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2                                                                                                                              | MR. HOLMAN: Thursday, November 10th, 2016.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3                                                                                                                   | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3                                                                                                                         | MR. HOLMAN: Thursday, November 10th, 2016. Q. And so we're clear, too, all of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2<br>3<br>4                                                                                                              | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4                                                                                                                    | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2<br>3<br>4<br>5                                                                                                         | VIDEOGRAPHER: Off the record, 1:01.  (Discussion off record.)  (Recess taken.)  (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  13:13:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5                                                                                                               | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2<br>3<br>4<br>5<br>6                                                                                                    | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6                                                                                                          | MR. HOLMAN: Thursday, November 10th, 2016. Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016. A. Thank you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                               | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.) 13:13:01 MR. HOLMAN: Go back on the record.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you.  Q. Agreed?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you.  Q. Agreed?  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  13:13:19                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you.  Q. Agreed?  A. Yes.  Q. Okay. So when did you first become 13:15:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  13:13:19 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  13:13:19  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  13:13:19  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct?                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00                                                                                                                                                                                                                                                                                                  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes.  Q. And you've testified that you have no firsthand knowledge of that incident; is that correct?  A. Yes.  13:13:31                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic.                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct?  A. Yes.  13:13:31 Q. You've also testified about the                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00 A. A police scanner that monitors any number of frequencies that are public, used by                                                                                                                                                                                                             |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.) 13:13:01 MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct? 13:13:19 A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes. 13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday,                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00 A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel.                                                                                                                                                                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes.  13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday, November 11th, correct?                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00  A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel. Q. And by members of the news media?                                                                                                                                                  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes.  13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday, November 11th, correct?                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00  A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel. Q. And by members of the news media? A. Well, we receive them. We don't 13:16:12                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes.  13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday, November 11th, correct? A. Yes. But before we go on, can I go back 13:13:44 and amend an answer?                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00  A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel. Q. And by members of the news media? A. Well, we receive them. We don't 13:16:12 transmit them.                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes.  13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday, November 11th, correct? A. Yes. But before we go on, can I go back 13:13:44 and amend an answer? Q. Sure. Please.                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00  A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel. Q. And by members of the news media? A. Well, we receive them. We don't 13:16:12 transmit them. Q. Okay. And is that something that you                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes.  13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday, November 11th, correct? A. Yes. But before we go on, can I go back 13:13:44 and amend an answer? Q. Sure. Please. A. Actually, can you remind me what the | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>22<br>23 | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic. Q. Okay. What's scanner traffic? 13:16:00  A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel. Q. And by members of the news media? A. Well, we receive them. We don't 13:16:12 transmit them. Q. Okay. And is that something that you and/or others monitor as part of being a news |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | VIDEOGRAPHER: Off the record, 1:01. (Discussion off record.) (Recess taken.) (Whereupon, Dr. Raimondo joined the deposition via teleconference.)  MR. HOLMAN: Go back on the record. VIDEOGRAPHER: On the record, 1:12. Q. So, Mr. Hawk, we've previously talked about the incident that took place at Gibson's Bakery on Wednesday, November 9th, correct?  A. Yes. Q. And you've testified that you have no firsthand knowledge of that incident; is that correct? A. Yes.  13:13:31 Q. You've also testified about the demonstration that you came across and that you visited for less than three hours on Friday, November 11th, correct? A. Yes. But before we go on, can I go back 13:13:44 and amend an answer? Q. Sure. Please.                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | MR. HOLMAN: Thursday, November 10th, 2016.  Q. And so we're clear, too, all of the questions that I'm going to ask until I state otherwise relate solely to Thursday, November 10, 13:15:38 2016.  A. Thank you. Q. Agreed? A. Yes. Q. Okay. So when did you first become 13:15:44 aware that there were demonstrations taking place around Gibson's Bakery on November 10th?  A. I don't recall the time, but I do recall that it was due to scanner traffic? 13:16:00  A. A police scanner that monitors any number of frequencies that are public, used by emergency personnel. Q. And by members of the news media? A. Well, we receive them. We don't 13:16:12 transmit them. Q. Okay. And is that something that you                                                                                |

|                | ·                                            |     |                                                              |              |
|----------------|----------------------------------------------|-----|--------------------------------------------------------------|--------------|
|                | Page 110                                     |     |                                                              | Page 112     |
| 1 Q. Ok        | ay. So it's your testimony that at           | 1   | Q. Do you know where he has an office?                       |              |
|                | nt on November 10th, you heard scanner       | 2   | A. No.                                                       |              |
|                | king about demonstrations?                   | 3   | Q. Do you know where he's located?                           |              |
| 4 A. Yes       | =                                            | 4   | A. No.                                                       |              |
| 5 Q. Do        | you recall what the scanner traffic 13:16:31 | 5   | Q. Do you know what city he lives in?                        | 13:19:03     |
| 6 said?        |                                              | 6   | A. No.                                                       |              |
| 7 A. No.       |                                              | 7   | Q. Do you have any knowledge at all                          |              |
| 8 Q. Do        | you recall anything about the scanner        | 8   | regarding his whereabouts?                                   |              |
| •              | t you heard on November 10th?                | 9   | A. He's in Ohio.                                             |              |
|                | just that it prompted us to go and 13:16:44  | 10  | Q. He's in Ohio? Okay. Is he in the                          | 13:19:12     |
| 11 look.       |                                              | 11  | Columbus area?                                               |              |
|                | ay. And who is the "us"?                     | 12  | A. I don't know.                                             |              |
| 13 A. My       | -                                            | 13  | Q. Okay. Cincinnati area?                                    |              |
| -              | ay. So the "us" that you just                | 14  | A. I also don't know.                                        |              |
|                | d refers to you and you alone? 13:16:54      | 15  | Q. Toledo area? 13:1                                         | 9:22         |
| 16 A. No       | •                                            | 16  | A. I don't know.                                             |              |
|                | ay. Because you're - you said that           | 17  | Q. The Dayton area?                                          |              |
|                | er traffic prompted, quote, "us" to go       | 18  | A. I really don't know.                                      |              |
|                | Who is the other person who went with        | 19  | Q. The Cleveland, Ohio, area?                                |              |
| 20 you?        | 13:17:14                                     | 20  |                                                              | 3:19:31      |
| <b>,</b>       | e publisher.                                 | 21  | Q. When was the last time that you talked                    |              |
|                | ay. Who is that?                             | 22  | to Mr. Hutson?                                               |              |
|                | the time, it was Tom Hutson.                 | 23  | A. I wouldn't be able to accurately say.                     |              |
|                | J-D-S-O-N?                                   | 24  | Q. Do you know what his responsibilities                     |              |
|                | J-T-S-O-N. 13:17:40                          | 25  | are? 13:19:48                                                |              |
|                | ar Reporting Services, LLC (440) 340-6161    | _ ~ |                                                              | 40) 340-6161 |
|                |                                              |     |                                                              | ,            |
|                | Page 111                                     |     |                                                              | Page 113     |
| -              | , H-U-T —                                    | 1   | A. He oversees production of several                         |              |
| 2 A. Yes       |                                              | 2   | newspapers.                                                  |              |
| 3 Q. – S       | -O-N. Hutson.                                | 3   | <ul> <li>Q. Does that include the newspapers that</li> </ul> |              |
| 4 <b>A.</b> Hu |                                              | 4   | you've previously discussed and identified?                  |              |
|                | eat, Thank you. During what period 13:17:46  | 5   | A. You mean the ones for which I'm                           | 13:20:05     |
|                | as he the publisher?                         | 6   | currently employed?                                          |              |
|                | elieve he was brought in sometime            | 7   | Q. Yes.                                                      |              |
|                | 007 and left our office in 2017.             | 8   | A. No.                                                       |              |
| 9 Q. For       | what papers did Mr. Hutson serve as          | 9   | Q. Okay. Do you know which newspaper                         | s he         |
| 10 publisher   |                                              | 10  | oversees? 13:20:1                                            |              |
| 11 A. The      | e Amherst News Times, Oberlin News           | 11  | A. I believe he's in charge of the Troy                      |              |
| 12 Tribune,    | Wellington Enterprise, and the Lorain        | 12  | Daily News.                                                  |              |
|                | Community Guide.                             | 13  | Q. Would that be Troy, Michigan?                             |              |
|                | you know where Mr. Hutson had worked         | 14  | A. Troy, Ohio.                                               |              |
|                | oning the papers that you were 13:18:26      | 15  | Q. Troy, Ohio. Okay. Are there any other                     | 13:20:25     |
| 16 associated  |                                              | 16  | papers?                                                      |              |
| 17 A. No       |                                              | 17  | A. Yes.                                                      |              |
| 18 Q. Do       | you know where Mr. Hutson went after         | 18  | Q. Okay. Which ones?                                         |              |
| 19 2017?       |                                              | 19  | A. I don't know.                                             |              |
| 20 A. Ye       | s. 13:18:39                                  | 20  | Q. So there was scanner traffic about a                      | 13:20:32     |
|                | ay. Where did he go?                         | 21  | demonstration on November 10 and that pror                   | npted        |
|                | was promoted to vice president within        | 22  | you and Mr. Hutson to leave your newspaper                   | -            |
|                | lia Midwest, our current company.            | 23  | office; is that correct?                                     |              |
|                | you know where his primary office is?        | 24  | A. Yes.                                                      |              |
| 25 A. No       | - ·                                          | 25  | Q. Okay. And that prompted both of you                       | o 13:20:48   |
| ZJ AL INU      |                                              |     |                                                              |              |
|                | ar Reporting Services, LLC (440) 340-6161    |     |                                                              | 40) 340-6161 |

|                                                                                                                                     | Page 114                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                | Page 116                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                                   | go to the demonstrations, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1                                                                                                                              | Q. Okay. No idea?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2                                                                                                                                   | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2                                                                                                                              | A. Not really, no.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3                                                                                                                                   | Q. How did you get there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 3                                                                                                                              | Q. Okay. So you're in the business of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 4                                                                                                                                   | A. By foot.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 4                                                                                                                              | gathering news, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5                                                                                                                                   | Q. By foot. And how long did it take you 13:20:57                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 5                                                                                                                              | A. Yes. 13:22:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6                                                                                                                                   | and Mr. Hutson to walk there?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 6                                                                                                                              | Q. And reporting on your observations,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 7                                                                                                                                   | A. Two, three, four minutes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7                                                                                                                              | correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| В                                                                                                                                   | Q. What kind of day was it, by the way?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 8                                                                                                                              | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 9                                                                                                                                   | A. Could you be more specific?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 9                                                                                                                              | Q. And reporting on interviews that you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10                                                                                                                                  | Q. Sure. In terms of the weather, what 13:21:09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 10                                                                                                                             | have with people, correct? 13:22:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 11                                                                                                                                  | kind of day was it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 11                                                                                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12                                                                                                                                  | A. It wasn't raining. It was a nice day.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 12                                                                                                                             | Q. And as a news reporter, it's important                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 13                                                                                                                                  | Q. Okay. Temperature-wise, what would you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 13                                                                                                                             | to be as precise as possible, both in describing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 14                                                                                                                                  | estimate?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 14                                                                                                                             | events, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 15                                                                                                                                  | A. I don't remember. 13:21:20                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 15                                                                                                                             | MR. KESLAR: Objection. That goes to 13:23:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 16                                                                                                                                  | Q. Was it sunny?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 16                                                                                                                             | state of mind, editorial process. You don't have                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 17                                                                                                                                  | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 17                                                                                                                             | to answer that,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 18                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 18<br>19                                                                                                                            | Q. Or cloudy?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 19                                                                                                                             | And also, it calls for potentially a legal conclusion, which he's not qualified to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 20                                                                                                                                  | A. There might have been clouds. I don't know. 13:21:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 20                                                                                                                             | provide. But based on the privilege, you don't 13:23:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 21                                                                                                                             | have to answer that,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 21<br>22                                                                                                                            | <ul><li>Q. Okay. What were you wearing that day?</li><li>A. I really don't know.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 22                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 23                                                                                                                             | Q. So in November of 2016, you were an                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 23                                                                                                                                  | Q. Okay. You have no idea what you were                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 24                                                                                                                             | editor, correct? A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 24                                                                                                                                  | wearing that day?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 25                                                                                                                                  | A. No. 13:21:33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 25                                                                                                                             | Q. Do you think it's important for editors 13:23:24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                                                                     | Molner Reporting Services LLC (A40) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1                                                                                                                              | Molner Reporting Services 11 C (AAO) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                     | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                     | Molnar Reporting Services, LLC (440) 340-6161  Page 115                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161  Page 117                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                     | Page 115                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1                                                                                                                              | Page 117                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1                                                                                                                                   | Page 115  Q. Okay. What was Mr. Hutson wearing that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 1 2                                                                                                                            | Page 117 to be accurate in reporting their observations?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1<br>2                                                                                                                              | Page 115  Q. Okay. What was Mr. Hutson wearing that day?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2                                                                                                                              | Page 117 to be accurate in reporting their observations? MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1<br>2<br>3                                                                                                                         | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3                                                                                                                         | Page 117 to be accurate in reporting their observations? MR. KESLAR: Objection. First Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1<br>2<br>3<br>4                                                                                                                    | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know.  Q. No recollection at all?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4                                                                                                                    | Page 117  to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1<br>2<br>3<br>4<br>5                                                                                                               | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5                                                                                                               | Page 117  to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1<br>2<br>3<br>4<br>5<br>6                                                                                                          | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6                                                                                                          | Page 117  to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1<br>2<br>3<br>4<br>5<br>6                                                                                                          | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | Page 117  to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you?                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | Page 117  to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you?  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | Q. Okay. What was Mr. Hutson wearing that day? A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | Q. Okay. What was Mr. Hutson wearing that day? A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen?                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | Q. Okay. What was Mr. Hutson wearing that day? A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least.                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations                                                                                                                                                                                                                                                                                                                                                                                             |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on?                                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?                                                                                                                                                                                                                                                                                                                                                                         |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59                                                                                                                                                                                                                                                                                                                          |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that.                                                                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.                                                                                                                                                                                                                                                                                                               |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | Page 115  Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.                                                                                                                                                                                                                                                                           |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there?                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the                                                                                                                                                                                                                               |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?                                                                                                                                                                                            |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West College Street and west on West College Street. 13:22:17                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?  MR. KESLAR: Objection. Same argument 13:24:09                                                                                                                                             |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West College Street and west on West College Street. 13:22:17 Q. So when you arrived at the                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?  MR. KESLAR: Objection. Same argument 13:24:09 for privilege.                                                                                                                              |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West College Street and west on West College Street. 13:22:17 Q. So when you arrived at the demonstration, what did you observe?                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?  MR. KESLAR: Objection. Same argument 13:24:09 for privilege.  I'm instructing you not to answer.                                                                                          |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West College Street and west on West College Street. 13:22:17 Q. So when you arrived at the demonstration, what did you observe? A. Protestors.                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?  MR. KESLAR: Objection. Same argument 13:24:09 for privilege.  I'm instructing you not to answer.  Q. As an editor, do you ever purposefully                                               |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West College Street and west on West College Street. 13:22:17 Q. So when you arrived at the demonstration, what did you observe? A. Protestors. Q. How many protestors? | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?  MR. KESLAR: Objection. Same argument 13:24:09 for privilege.  I'm instructing you not to answer.  Q. As an editor, do you ever purposefully mislead the public as to the contents of your |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. Okay. What was Mr. Hutson wearing that day?  A. I don't know. Q. No recollection at all? A. No. 13:21:38 Q. Okay. So when you left the newspaper that day with Mr. Hutson, did you have your cell phone with you? A. Yes. Q. Your camera? 13:21:49 A. Yes. Q. At least one pen? A. At least. Q. Okay. Paper to write on? A. Yes, sir. 13:22:01 Q. Okay. So you and – strike that. So which way did you go when you were walking over there? A. Down South Main Street north toward West College Street and west on West College Street. 13:22:17 Q. So when you arrived at the demonstration, what did you observe? A. Protestors.                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | to be accurate in reporting their observations?  MR. KESLAR: Objection. First Amendment privilege.  You don't have to answer that.  Q. As an editor, do you think it's 13:23:35 important to report what you learn as accurately as possible?  MR. KESLAR: Same objection.  Goes to your state of mind. You don't have to answer that. It's covered by the First 13:23:49 Amendment to the U.S. Constitution.  Q. As an editor, is it important to you to be accurate in reporting your observations regarding an event?  MR. KESLAR: Same objection regarding 13:23:59 privilege.  I'm instructing you not to answer.  Q. As an editor, do you try to mislead the public as to what you've observed?  MR. KESLAR: Objection. Same argument 13:24:09 for privilege.  I'm instructing you not to answer.  Q. As an editor, do you ever purposefully                                               |

| <del></del> |                                                                                            | Γ        |                                                                                           |
|-------------|--------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------|
| _           | Page 118                                                                                   |          | Page 120                                                                                  |
| 1           | MR. KESLAR: Objection. Same argument                                                       | 1        | A. Yes.                                                                                   |
| 2           | for privilege.                                                                             | 2        | Q. Okay. You agree with the number 250?                                                   |
| 3           | I'm instructing you not to answer.                                                         | 3        | That's your number, right?                                                                |
| 4           | Q. So there is a group gathered that were                                                  | 4        | A. No. Actually, you suggested that                                                       |
| 5           | demonstrating. Where did you find this group 13:24:32                                      | 5        | number, 13:26:10                                                                          |
| 6           | demonstrating?                                                                             | 6        | Q. Okay. But do you agree or disagree with                                                |
| 7           | A. On West Main Street, I'm sorry. On                                                      | 7        | that number?                                                                              |
| 8           | West College Street.                                                                       | 8        | A. I agree that 250 is reasonable.                                                        |
| 9           | Q. On West College Street?                                                                 | 9        | Q. So –                                                                                   |
| 10          | A. Yes. 13:24:43                                                                           | 10       | A. Also, you stipulated an entire time 13:26:17                                           |
| 11          | Q. Okay. And it's your testimony that you                                                  | 11       | period of the entire day. I don't know how many                                           |
| 12          | have no idea how many people you saw on November                                           | 12       | people that were there the entire day.                                                    |
| 13          | 10th?                                                                                      | 13       | Q. Okay. So let's be clear.                                                               |
| 14          | A. It's my testimony that I don't recall at                                                | 14       | So when you and Mr. Hutson arrived, is                                                    |
| 15          | this point. 13:24:52                                                                       | 15       | it your testimony that there were approximately 13:26;29                                  |
| 16          | Q. Don't recall. Is there anything that                                                    | 16       | 250 demonstrators present?                                                                |
| 17          | would refresh your recollection as to the size of                                          | 17<br>18 | MR. KESLAR; Objection.  Mischaracterization.                                              |
| 18          | the group that you saw that day?                                                           | 19       |                                                                                           |
| 19<br>20    | A. If you would provide photos, I could                                                    | 20       | Go ahead.<br>A. No. 13:26:36                                                              |
| 21          | estimate based on photos. 13:25:02 Q. If would you agree or disagree with                  | 21       |                                                                                           |
| 22          | Q. If – would you agree or disagree with me that there were 5,000 people present that day? | 21       | Q. Okay. So what is your testimony?  A. That 250 would be a fair assessment, a            |
| 23          | A. I'd disagree.                                                                           | 23       | A. That 250 would be a fair assessment, a fair estimate, but I don't know how many people |
| 23          | Q. Okay. What about if I said that there                                                   | 24       | were there.                                                                               |
| 25          | were 2,500 people that day? 13:25:14                                                       | 25       | Q. Sure. Of course you don't. And I'm not 13:26:46                                        |
| رکا         | Molnar Reporting Services, LLC (440) 340-6161                                              | 23       | Molnar Reporting Services, LLC (440) 340-6161                                             |
|             | Works reporting Services, LLC (440) 540-0101                                               |          | 1440) 340-0101                                                                            |
|             | Page 119                                                                                   |          | Page 121                                                                                  |
| 1           | A. I'd disagree.                                                                           | 1        | asking you to - I know you didn't count. At                                               |
| 2           | Q. What about 1,125 people?                                                                | 2        | least I don't think you counted.                                                          |
| 3           | A. For the entire duration of the day?                                                     | 3        | So 250 would be a fair estimate of the                                                    |
| 4           | Q. Yes.                                                                                    | 4        | number of people that you saw on November 10?                                             |
| 5           | A. It's hard to say. 13:25:25                                                              | 5        | A. No. 13:26:56                                                                           |
| 6           | Q. Okay. What about 1,000 people?                                                          | 6        | Q. Okay.                                                                                  |
| 7           | A. It's also hard to say.                                                                  | 7        | A. It would be a fair estimate of the                                                     |
| 8           | Q. Okay. 500?                                                                              | 8        | number of people who were there when we                                                   |
| 9           | A. I don't know.                                                                           | 9        | arrived -                                                                                 |
| 10          | Q. 250? 13:25:33                                                                           | 10       | Q. Okay. 13:27:02                                                                         |
| 11          | A. I'd say that that's extremely fair.                                                     | 11       | A. — which was your question.                                                             |
| 12          | Q. Okay. So your best estimate is that                                                     | 12       | Q. Fine. Okay. So when you arrived, it's                                                  |
| 13          | there were approximately 250 people present at                                             | 13       | your testimony that you saw approximately 250                                             |
| 14          | the demonstration on November 10, correct?                                                 | 14       | individuals at the demonstration, correct?                                                |
| 15          | A. No - 13:25:49                                                                           | 15       | A. That's seems fair. 13:27:12                                                            |
| 16          | MR. KESLAR: Objection to                                                                   | 16       | Q. Okay. So when you arrived, what else                                                   |
| 17          | mischaracterization.                                                                       | 17       | did you see going on?                                                                     |
| 18          | I'm sorry. Go ahead.                                                                       | 18       | A. Could you be more specific?                                                            |
| 19          | A. No, it's not my testimony.                                                              | 19       | (Whereupon, Ms. Crocker left the                                                          |
| 20          | Q. Okay. So is it your testimony that it's 13:25:53                                        | 20       | conference room.) 13:27:27                                                                |
| 21          | fair to say that there were approximately 250                                              | 21       | Q. Sure. So you and Mr. Hutson arrived at                                                 |
| 22          | people who were at some or all of the                                                      | 22       | the demonstration, right?                                                                 |
| 23          | demonstration on November 10th?                                                            | 23       | A. Correct.                                                                               |
| 24          | A. At some of the demonstration?                                                           | 24       | Q. Where did you walk to?                                                                 |
| 25          | Q. Yes. 13:26:02  Molecus Reporting Services LLC (440) 340 6161                            | 25       | A. I believe we ended up standing, at least 13:27:34                                      |
|             | wiomar reporting Services, LLC (440) 340-6161                                              | 1        | wioinar reporting Services, LLC (440) 340-6161                                            |
|             | Molnar Reporting Services, LLC (440) 340-6161                                              | 23       | Molnar Reporting Services, LLC (440) 340-6161                                             |

|                                                                                                                                                                           | <del></del>                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Page 122                                                                                                                                                                  | Page 124                                                                                         |
| 1 initially, pretty much right in front of the door                                                                                                                       | 1 that I recognized on the 10th or the 11th.                                                     |
| 2 but more toward the road.                                                                                                                                               | <ol> <li>Q. Okay. When you arrived and were</li> </ol>                                           |
| 3 Q. When you say "the door," are you                                                                                                                                     | 3 standing on the curb, were the demonstrators                                                   |
| 4 referring to, what, Gibson's Bakery door?                                                                                                                               | 4 singing?                                                                                       |
| 5 A. Yes, sir. 13:27:46                                                                                                                                                   | 5 A. I don't know that they were singing 13:29:55                                                |
| <ol> <li>Q. So when you and Mr. Hutson arrived,</li> </ol>                                                                                                                | 6 right then.                                                                                    |
| 7 approximately how far were you, at least                                                                                                                                | 7 Q. Okay. Were they chanting anything?                                                          |
| 8 initially, from Gibson's Bakery's door?                                                                                                                                 | 8 A. During the duration that I was there,                                                       |
| 9 A. Whatever the setback to the curb is.                                                                                                                                 | 9 yes, they were chanting. 10 O. Okay. What about when you actually 13:30:06                     |
| 10 Q. Are you saying that you and Mr. Hutson 13:27:57                                                                                                                     | 4. 2.m/s                                                                                         |
| were standing on the curb when you arrived                                                                                                                                | 11 arrived initially and were standing on the curb? 12 Was there chanting going on at that time? |
| 12 initially?                                                                                                                                                             | 13 A. I don't recall what happened at that                                                       |
| <ul> <li>A. Mr. Hutson peeled off. I'm not entirely</li> <li>sure where he went for a little while.</li> </ul>                                                            | 13 A. Tuont recan what happened at that                                                          |
| <ul> <li>sure where he went for a little while.</li> <li>Q. Okay.</li> <li>13:28:08</li> </ul>                                                                            | 15 Q. By the way, when you walked over to the 13:30:17                                           |
| 16 A. But yes, I was standing on the curb.                                                                                                                                | 16 demonstration, were you wearing any press                                                     |
| 17 Q. Okay. When you initially arrived, was                                                                                                                               | 17 credentials?                                                                                  |
| 18 Mr. Hutson there on the curb with you?                                                                                                                                 | 18 A. No.                                                                                        |
| 19 (Whereupon, Ms. Crocker entered the                                                                                                                                    | 19 Q. Okay. Do you understand what I'm saying                                                    |
| 20 conference room.) 13:28:20                                                                                                                                             | 20 when I say press credentials? 13:30:27                                                        |
| 21 A. No, I don't believe so.                                                                                                                                             | 21 A. Yes.                                                                                       |
| <ol> <li>Q. So approximately what is the distance</li> </ol>                                                                                                              | <ol> <li>Q. And let me just rephrase.</li> </ol>                                                 |
| 23 between the Gibson's Bakery storefront and the                                                                                                                         | 23 When you and Mr. Hutson walked over to                                                        |
| 24 curb where you were standing?                                                                                                                                          | 24 the demonstration on November 10, were you                                                    |
| 25 A. 20 feet, maybe. 13:28:33                                                                                                                                            | 25 carrying any badges that identified you as a 13:30:36                                         |
| Molnar Reporting Services, LLC (440) 340-6161                                                                                                                             | Molnar Reporting Services, LLC (440) 340-6161                                                    |
| Page 123                                                                                                                                                                  | Page 125                                                                                         |
| 1 Q. Okay. So you were there standing at the                                                                                                                              | 1 member of the media?                                                                           |
| 2 curb. You just arrived from leaving your office,                                                                                                                        | 2 A. No.                                                                                         |
| 3 correct?                                                                                                                                                                | 3 Q. Okay. What about Mr. Hutson?                                                                |
| 4 A. Yes.                                                                                                                                                                 | 4 A. No.                                                                                         |
| 5 Q. And I presume you looked around? 13:28:41                                                                                                                            | 5 Q. Okay. As you were standing on the curb 13:30:44                                             |
| 6 A. Yes.                                                                                                                                                                 | 6 looking around, about how many signs did you see?                                              |
| 7 Q. What did you see?                                                                                                                                                    | 7 A. I don't have an accurate way to estimate                                                    |
| 8 A. Could you be more specific?                                                                                                                                          | 8 that.                                                                                          |
| 9 Q. Sure. Did you see people holding signs?                                                                                                                              | 9 Q. Okay. As you were standing on the curb,                                                     |
| 10 A. Yes, I did. 13:28:52                                                                                                                                                | 10 were there speeches being made? 13:31:03                                                      |
| 11 Q. Okay. What did the signs say?                                                                                                                                       | 11 A. I wouldn't say that there were speeches                                                    |
| 12 A. I don't recall.                                                                                                                                                     | being made. There was one person with a                                                          |
| Q. Okay. So you have no recollection of                                                                                                                                   | 13 megaphone.                                                                                    |
| 14 what the signs said that day?                                                                                                                                          | 14 Q. Okay. Do you know who that person was?<br>15 A. No. 13:31:23                               |
| 15 A. I didn't memorize any specific signs, 13:29:00                                                                                                                      | 15 A. No. 13:31:23 16 Q. Do you have any personal knowledge as to                                |
| 16 no.                                                                                                                                                                    | 16 Q. Do you have any personal knowledge as to 17 where that megaphone came from?                |
| 17 Q. I'm not asking if you – I'm just asking                                                                                                                             | 18 A. No.                                                                                        |
| 18 do you recall what you what strike that. 19 Do you recall what signs you observed as                                                                                   | 19 Q. Do you recall what that person was                                                         |
| 20 you were standing there on the curb? 13:29:09                                                                                                                          | 20 saying who held the megaphone? 13:31:37                                                       |
| 20 you were standing there on the curb? 13.29.09  21 A. No, I don't remember what the signs said                                                                          | 21 MR. KESLAR: Objection. That would be                                                          |
| 22 specifically a year and a half ago.                                                                                                                                    | 22 unpublished information gathered during the                                                   |
| 23 Q. Did you recognize anyone that you knew                                                                                                                              | 23 reporting process. It falls within the First                                                  |
|                                                                                                                                                                           | 24 Amendment privilege.                                                                          |
| 2.4 as you were standing on the curb?                                                                                                                                     |                                                                                                  |
| 24 as you were standing on the curb? 25 A I don't recall whether I saw the person 13:29:33                                                                                | 25 You don't have to answer that, 13:31:50                                                       |
| <ul> <li>as you were standing on the curb?</li> <li>A. I don't recall whether I saw the person 13:29:33</li> <li>Molnar Reporting Services, LLC (440) 340-6161</li> </ul> | 25 You don't have to answer that. 13:31:50 Molnar Reporting Services, LLC (440) 340-6161         |

| Page 126  D. Was the person with the megaphone using emegaphone?  D. Yes. D. Okay. What was that person saying with emegaphone?  MR. KESLAR: Objection. Calls for published information gathered during the news porting process.  You don't have to answer that question.  Protected by the First Amendment.  D. So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  D. Yes, sir. D. Okay. Who is that person?  M. Frank Carlson. D. Who is he?  M. At the time, he served as a prosecutor or the municipal court and also as assistant law vector for the City of Amherst.  M. I take it this is someone that you've own probably for some time?  M. I'd recognize him, yes. I see him in blic meetings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                  | into the bakery. Q. Did anyone in the crowd direct any comments to him? A. The crowd was directing comments to everyone on the sidewalk. Q. Okay. Did anyone as far as you saw purposefully impede his access to the door and the bakery? A. They didn't physically bar him by touching him, no. 13:34:22 Q. Did anyone refuse to allow him to go past and into the bakery? A. No. He made his entry into the bakery. Q. So is Frank Carlson the only person who you recognized on either November 10 or 11? A. Yes. Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself? A. Most of the reporting was done from there.        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| e megaphone?  1. Yes.  2. Okay. What was that person saying with emegaphone?  13:32:05  MR. KESLAR: Objection. Calls for published information gathered during the news porting process.  You don't have to answer that question.  Protected by the First Amendment.  2. So you said that there was one dividual who you recognize, but you're not sure preter it was November 10 or 11th, correct?  2. Yes, sir.  2. Okay. Who is that person?  3. Frank Carlson.  3. Who is he?  4. At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst.  3. I take it this is someone that you've own probably for some time?  4. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                       | Q. Did anyone in the crowd direct any comments to him?  A. The crowd was directing comments to everyone on the sidewalk.  Q. Okay. Did anyone as far as you saw purposefully impede his access to the door and the bakery?  A. They didn't physically bar him by touching him, no.  13:34:22  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  13:34:36  A. Yes.  Q. So approximately – strike that.  So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from |
| A. Yes.  2. Okay. What was that person saying with emegaphone?  31:32:05  MR. KESLAR: Objection. Calls for published information gathered during the news porting process.  You don't have to answer that question.  Frotected by the First Amendment.  So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  A. Yes, sir.  C. Okay. Who is that person?  A. Frank Carlson.  C. Who is he?  A. At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst.  C. I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                            | comments to him?  A. The crowd was directing comments to everyone on the sidewalk.  Q. Okay. Did anyone as far as you saw purposefully impede his access to the door and the bakery?  A. They didn't physically bar him by touching him, no.  13:34:22  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  13:34:36  A. Yes.  Q. So approximately — strike that.  So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from                                       |
| 2. Okay. What was that person saying with a megaphone?  MR. KESLAR: Objection. Calls for published information gathered during the news porting process.  You don't have to answer that question.  Protected by the First Amendment.  Protected by the First Amendmen | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                 | A. The crowd was directing comments to everyone on the sidewalk.  Q. Okay. Did anyone as far as you saw purposefully impede his access to the door and the bakery?  A. They didn't physically bar him by touching him, no.  13:34:22  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  13:34:36  A. Yes.  Q. So approximately – strike that.  So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb  13:34:51 itself?  A. Most of the reporting was done from                                                        |
| emegaphone?  MR. KESLAR: Objection. Calls for published information gathered during the news porting process.  You don't have to answer that question.  protected by the First Amendment.  Do So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  M. Yes, sir.  Do Okay. Who is that person?  M. Frank Carlson.  Mo Who is he?  M. At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst.  M. I take it this is someone that you've own probably for some time?  M. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                      | everyone on the sidewalk.  Q. Okay. Did anyone as far as you saw purposefully impede his access to the door and the bakery?  A. They didn't physically bar him by touching him, no.  13:34:22  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  13:34:36  A. Yes.  Q. So approximately – strike that.  So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from                                                                                                |
| MR. KESLAR: Objection. Calls for published information gathered during the news porting process.  You don't have to answer that question.  protected by the First Amendment. 13:32:14  D. So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  A. Yes, sir.  D. Okay. Who is that person? 13:32:23  A. Frank Carlson.  D. Who is he?  A. At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst. 13:32:41  D. I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                           | Q. Okay. Did anyone as far as you saw purposefully impede his access to the door and the bakery?  A. They didn't physically bar him by touching him, no. 13:34:22  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11? 13:34:36  A. Yes.  Q. So approximately — strike that. So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from                                                                                                                              |
| published information gathered during the news porting process.  You don't have to answer that question. It protected by the First Amendment.  So you said that there was one dividual who you recognize, but you're not sure nether it was November 10 or 11th, correct?  Yes, sir.  Okay. Who is that person?  Frank Carlson.  Who is he?  At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst.  I take it this is someone that you've own probably for some time?  The recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                | purposefully impede his access to the door and the bakery?  A. They didn't physically bar him by touching him, no. 13:34:22  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11? 13:34:36  A. Yes.  Q. So approximately – strike that. So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb itself?  A. Most of the reporting was done from                                                                                                                                                                             |
| you don't have to answer that question. I protected by the First Amendment. I 3:32:14 I So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct? I Yes, sir. I Okay. Who is that person? I 3:32:23 I Frank Carlson. I Who is he? I At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst. I 13:32:41 I take it this is someone that you've own probably for some time? I I recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                     | the bakery?  A. They didn't physically bar him by touching him, no.  Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  A. Yes.  Q. So approximately – strike that.  So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                             |
| You don't have to answer that question.  It protected by the First Amendment.  It is protected by the First Amendment.  It is open a side that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  It is yes, sir.  It is open a side of the person?  It is open  | 9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                          | A. They didn't physically bar him by touching him, no. 13:34:22 Q. Did anyone refuse to allow him to go past and into the bakery? A. No. He made his entry into the bakery. Q. So is Frank Carlson the only person who you recognized on either November 10 or 11? 13:34:36 A. Yes. Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself? A. Most of the reporting was done from                                                                                                                                                                                                                                                |
| protected by the First Amendment. 13:32:14 2. So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct? 2. Yes, sir. 2. Okay. Who is that person? 13:32:23 3. Frank Carlson. 3. Who is he? 4. At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst. 13:32:41 3. I take it this is someone that you've own probably for some time? 4. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                               | touching him, no. 13:34:22 Q. Did anyone refuse to allow him to go past and into the bakery? A. No. He made his entry into the bakery. Q. So is Frank Carlson the only person who you recognized on either November 10 or 11? 13:34:36 A. Yes. Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself? A. Most of the reporting was done from                                                                                                                                                                                                                                                                                     |
| 2. So you said that there was one dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  2. Yes, sir.  2. Okay. Who is that person?  3. Frank Carlson.  3. Who is he?  4. At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst.  3. I take it this is someone that you've own probably for some time?  4. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                     | Q. Did anyone refuse to allow him to go past and into the bakery?  A. No. He made his entry into the bakery. Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  A. Yes. Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                      |
| dividual who you recognize, but you're not sure mether it was November 10 or 11th, correct?  L. Yes, sir.  Okay. Who is that person?  Tank Carlson.  Who is he?  At the time, he served as a prosecutor or the municipal court and also as assistant law rector for the City of Amherst.  I take it this is someone that you've own probably for some time?  To recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                           | past and into the bakery?  A. No. He made his entry into the bakery.  Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  A. Yes.  Q. So approximately – strike that.  So you've arrived at the demonstration.  You're standing on the curb. You're looking around. How long did you stay there at the curb itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                          |
| nether it was November 10 or 11th, correct?  A. Yes, sir.  D. Okay. Who is that person?  13:32:23  A. Frank Carlson.  D. Who is he?  A. At the time, he served as a prosecutor rethe municipal court and also as assistant law rector for the City of Amherst.  13:32:41  D. I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                                 | A. No. He made his entry into the bakery. Q. So is Frank Carlson the only person who you recognized on either November 10 or 11? A. Yes. Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself? A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                           |
| A. Yes, sir.  D. Okay. Who is that person?  13:32:23  A. Frank Carlson.  D. Who is he?  A. At the time, he served as a prosecutor rethe municipal court and also as assistant law rector for the City of Amherst.  13:32:41  D. I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                                       | Q. So is Frank Carlson the only person who you recognized on either November 10 or 11?  A. Yes. Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 2. Okay. Who is that person?  13:32:23  2. Frank Carlson.  2. Who is he?  2. At the time, he served as a prosecutor rector for the City of Amherst.  2. I take it this is someone that you've own probably for some time?  3. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                                             | you recognized on either November 10 or 11?  A. Yes.  Q. So approximately – strike that. So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| A. Frank Carlson.  Q. Who is he?  A. At the time, he served as a prosecutor rethe municipal court and also as assistant law rector for the City of Amherst.  Q. I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                                                   | <ul> <li>A. Yes.</li> <li>Q. So approximately – strike that.</li> <li>So you've arrived at the demonstration.</li> <li>You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?</li> <li>A. Most of the reporting was done from</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2. Who is he? 2. At the time, he served as a prosecutor rethe municipal court and also as assistant law rector for the City of Amherst.  13:32:41 2. I take it this is someone that you've own probably for some time? 3. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 17<br>18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                                                         | <ul> <li>Q. So approximately – strike that.</li> <li>So you've arrived at the demonstration.</li> <li>You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?</li> <li>A. Most of the reporting was done from</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| A. At the time, he served as a prosecutor of the municipal court and also as assistant law rector for the City of Amherst.  13:32:41  2. I take it this is someone that you've rown probably for some time? 2. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 18<br>19<br>20<br>21<br>22<br>23<br>24                                                                                                                                               | So you've arrived at the demonstration. You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| r the municipal court and also as assistant law ector for the City of Amherst. 13:32:41  ). I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 19<br>20<br>21<br>22<br>23<br>24                                                                                                                                                     | You're standing on the curb. You're looking around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| ector for the City of Amherst. 13:32:41  Q. I take it this is someone that you've own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 20<br>21<br>22<br>23<br>24                                                                                                                                                           | around. How long did you stay there at the curb 13:34:51 itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| One of the control o  | 21<br>22<br>23<br>24                                                                                                                                                                 | itself?  A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| own probably for some time?  A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 22<br>23<br>24                                                                                                                                                                       | A. Most of the reporting was done from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| A. I'd recognize him, yes. I see him in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 23                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 24                                                                                                                                                                                   | there.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| blic meetings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1 0-                                                                                                                                                                                 | Q. Okay. Did you try to interview people                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ). Did you speak to Mr. Carlson? 13:32:53                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 25                                                                                                                                                                                   | when you were there? 13:35:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                      | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Page 127                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                      | Page 129                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 1                                                                                                                                                                                    | MR. KESLAR: Objection. That goes to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| ). Okay. Did he speak to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2                                                                                                                                                                                    | his methods of reporting, which is protected by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 3                                                                                                                                                                                    | the First Amendment. It also calls for a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <ol> <li>Did he acknowledge your presence in any</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 4                                                                                                                                                                                    | response about what might have been said, which                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| ay? 13:33:07                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                                                                                                    | is also privileged information for both reasons. 13:35:23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 6                                                                                                                                                                                    | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Did you acknowledge his presence in any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7                                                                                                                                                                                    | Q. Did you talk to anyone at the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| ay?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 8                                                                                                                                                                                    | demonstration on November 10?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9                                                                                                                                                                                    | MR. KESLAR: Objection to the extent                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Q. What was he doing? 13:33:11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 10                                                                                                                                                                                   | that it calls for information that's not 13:35:35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| A. He pushed through the crowd of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 11                                                                                                                                                                                   | previously disclosed in the news articles that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| otestors to get to the door.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 12                                                                                                                                                                                   | we're here about. It's protected by the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Q. When you say "he pushed through the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 13                                                                                                                                                                                   | reporter's privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| owd," can you further describe what you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 14                                                                                                                                                                                   | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| served? 13:33:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 15                                                                                                                                                                                   | Q. And I'll ask again. Did you talk to 13:35:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| TOTAL TOTAL STATE OF THE STATE  | 16                                                                                                                                                                                   | anyone at the demonstration on November 10, 2016?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| A. Without physically touching anyone,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 17                                                                                                                                                                                   | MR. KESLAR: And I'd caution you not                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 18                                                                                                                                                                                   | to not to provide any information in response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| A. Without physically touching anyone,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 19                                                                                                                                                                                   | to that question that wasn't printed in the news                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 20                                                                                                                                                                                   | articles as it would be privileged. To the 13:36:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near e, and used his body to project a bubble around                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 21                                                                                                                                                                                   | extent that it was printed in the news articles,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near e, and used his body to project a bubble around mself, I guess, is a way to say it. He made  13:33:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                      | you can respond.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near e, and used his body to project a bubble around mself, I guess, is a way to say it. He made 13:33:47 are that he knew that people weren't going to be                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 22                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near e, and used his body to project a bubble around mself, I guess, is a way to say it. He made 13:33:47 are that he knew that people weren't going to be oming near him.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 22<br>23                                                                                                                                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near e, and used his body to project a bubble around mself, I guess, is a way to say it. He made 13:33:47 are that he knew that people weren't going to be oming near him.  Q. What else did he say as he was pushing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | i i                                                                                                                                                                                  | A. Yes. O. Okay. Who did you speak to?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| A. Without physically touching anyone, ir. Carlson made his way to the door, but ontinually said don't touch me, don't come near e, and used his body to project a bubble around mself, I guess, is a way to say it. He made 13:33:47 are that he knew that people weren't going to be oming near him.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 23                                                                                                                                                                                   | A. Yes. Q. Okay. Who did you speak to? A. Meredith Raimondo. 13:36:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| ~                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Carlson made his way to the door, but tinually said don't touch me, don't come near and used his body to project a bubble around self, I guess, is a way to say it. He made 13:33:47 | Carlson made his way to the door, but tinually said don't touch me, don't come near and used his body to project a bubble around self, I guess, is a way to say it. He made that he knew that people weren't going to be ting near him.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Page 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 0                                                                                                     | Page 132                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 Q. Okay, Who is that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1                                                                                                     | what you just said?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2 A. The dean of students for Oberlin                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2                                                                                                     | MR. KESLAR: I said asked and answered,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3 College.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 3                                                                                                     | but to the extent that you remember something                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4 Q. When did you become aware that she was                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4                                                                                                     | different, go ahead.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5 the dean of students? 13:36:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 5                                                                                                     | THE WITNESS: Do you mind if I have a 13:38:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 6 A. She introduced herself.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 6                                                                                                     | moment to talk to Mr. Keslar?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 7 Q. Okay. About how long after your arrival                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7                                                                                                     | MR. HOLMAN; No, not at all. Of course.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 8 at the demonstration on November 10 did you have                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 8                                                                                                     | We'll go off the record. We're going off the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9 contact with Meredith Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 9                                                                                                     | record,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10 A. Relatively soon after arriving. 13:36:45                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 10                                                                                                    | VIDEOGRAPHER: Off the record, 1:38. 13:38:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 11 Q. Within 30 minutes after your arrival?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 11                                                                                                    | (Recess taken.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12 A. Yes, definitely.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 12                                                                                                    | VIDEOGRAPHER: On the record, 1:53.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13 Q. Okay. Can you describe for us your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 13                                                                                                    | Q. Meredith, are you on the line?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 14 contact with Meredith Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 14                                                                                                    | DR. RAIMONDO: Yes, I am.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 15 MR, KESLAR: Objection. Calls for 13:37:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 15                                                                                                    | MR. HOLMAN: Good, thank you. John, are 13:53:49                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| privileged information protected by the First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 16                                                                                                    | you on the line?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 17 Amendment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 17                                                                                                    | MR, BUSSIAN: On the line.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 18 I'm going to instruct you not to answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 18                                                                                                    | MR. HOLMAN: Great. That's very good                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 19 that broad of a question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 19                                                                                                    | news, too. So we are back on the record.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 20 Q. Did you speak to Meredith Raimondo? 13:37:1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 10 20                                                                                                 | Q. So you've testified, Mr. Hawk, that you 13:54:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 21 A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 21                                                                                                    | talked to Meredith Raimondo at the demonstration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 22 Q. Okay. What did you say to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 22                                                                                                    | on November 10th, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 23 A. I don't recall exactly what was said.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 23                                                                                                    | A. Correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Q. Okay. What did Dr. Raimondo say to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 24                                                                                                    | Q. Where did this conversation take place?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| MR. KESLAR: Objection, Calls for 13:37:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 25                                                                                                    | A. On the sidewalk on West College Street. 13:54:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                       | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Page 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 31                                                                                                    | Page 133                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | }                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1 previously undisclosed information gathered                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 1                                                                                                     | Q. Okay. Can you describe what part of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2 during his reporting process and is protected by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2                                                                                                     | sidewalk you were on when you talked to her?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3 the First Amendment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 3                                                                                                     | A. Close to the curb, cars just behind, probably six or seven feet away from the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 4 5                                                                                                   | protestors. 13:54:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5 Q. So you don't recall what Dr. Raimondo 13:37:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | ) 3                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 6                                                                                                     | •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6 said to you, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 6                                                                                                     | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7 MR. KESLAR: That's a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7                                                                                                     | Q. Okay. A. Maybe a little bit more.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7 MR. KESLAR: That's a mischaracterization, and to the extent it calls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 7 8                                                                                                   | <ul><li>Q. Okay.</li><li>A. Maybe a little bit more.</li><li>Q. Where were you standing in relation to</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 7<br>8<br>9                                                                                           | <ul><li>Q. Okay.</li><li>A. Maybe a little bit more.</li><li>Q. Where were you standing in relation to</li><li>Gibson's Bakery?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7<br>8<br>9<br>10                                                                                     | <ul> <li>Q. Okay.</li> <li>A. Maybe a little bit more.</li> <li>Q. Where were you standing in relation to</li> <li>Gibson's Bakery?</li> <li>A. Fairly close to the entrance.</li> <li>13:54:48</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7<br>8<br>9<br>10<br>11                                                                               | <ul> <li>Q. Okay.</li> <li>A. Maybe a little bit more.</li> <li>Q. Where were you standing in relation to</li> <li>Gibson's Bakery?</li> <li>A. Fairly close to the entrance. 13:54:48</li> <li>Q. Did you talk to her actually in front of</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7<br>8<br>9<br>10<br>11                                                                               | <ul> <li>Q. Okay.</li> <li>A. Maybe a little bit more.</li> <li>Q. Where were you standing in relation to</li> <li>Gibson's Bakery?</li> <li>A. Fairly close to the entrance. 13:54:48</li> <li>Q. Did you talk to her actually in front of</li> <li>Gibson's Bakery?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                     |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 7<br>8<br>9<br>10<br>11<br>12                                                                         | <ul> <li>Q. Okay.</li> <li>A. Maybe a little bit more.</li> <li>Q. Where were you standing in relation to</li> <li>Gibson's Bakery?</li> <li>A. Fairly close to the entrance. 13:54:48</li> <li>Q. Did you talk to her actually in front of</li> <li>Gibson's Bakery?</li> <li>A. It might be slightly to the east.</li> </ul>                                                                                                                                                                                                                                                                                                                       |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | <ul> <li>Q. Okay.</li> <li>A. Maybe a little bit more.</li> <li>Q. Where were you standing in relation to</li> <li>Gibson's Bakery?</li> <li>A. Fairly close to the entrance. 13:54:48</li> <li>Q. Did you talk to her actually in front of</li> <li>Gibson's Bakery?</li> <li>A. It might be slightly to the east.</li> <li>Q. Okay. So I'm bad with directions, so if</li> </ul>                                                                                                                                                                                                                                                                   |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | <ul> <li>Q. Okay.</li> <li>A. Maybe a little bit more.</li> <li>Q. Where were you standing in relation to</li> <li>Gibson's Bakery?</li> <li>A. Fairly close to the entrance. 13:54:48</li> <li>Q. Did you talk to her actually in front of</li> <li>Gibson's Bakery?</li> <li>A. It might be slightly to the east.</li> <li>Q. Okay. So I'm bad with directions, so if</li> <li>you're looking at Gibson's Bakery, would that be 13:55:04</li> </ul>                                                                                                                                                                                                |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 16 to this lawsuit. He's not planning on there's                                                                                                                                                                                                                                                                                                                                                                                                              | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right?                                                                                                                                                                                                                                                                        |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point                                                                                                                                                                                                                                                                                                                                                          | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right? A. To the left.                                                                                                                                                                                                                                                        |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an                                                                                                                                                                                                                                                                                                 | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right? A. To the left. Q. Okay. And how long did your                                                                                                                                                                                                                         |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially                                                                                                                                                                                                                                                           | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last?                                                                                                                                                                                             |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially 20 legal conclusions and I'm going to instruct you 13:38:12                                                                                                                                                                                      | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last? MR. KESLAR: That's undisclosed 13:55:19                                                                                                                                                     |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially 20 legal conclusions and I'm going to instruct you 13:38:12 21 not to answer that, either.                                                                                                                                                       | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last? MR. KESLAR: That's undisclosed 13:55:19 information. It really invades the reporter's                                                                                                       |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially 20 legal conclusions and I'm going to instruct you 13:38:12 21 not to answer that, either. 22 Q. What did you say to Dr. Raimondo?                                                                                                               | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be 13:55:04 to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last? MR. KESLAR: That's undisclosed 13:55:19 information. It really invades the reporter's state of mind. It calls for information                                                               |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially 20 legal conclusions and I'm going to instruct you 13:38:12 10 not to answer that, either. 21 Q. What did you say to Dr. Raimondo? 22 MR. KESLAR: Asked and answered, but to                                                                     | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last? MR. KESLAR: That's undisclosed information. It really invades the reporter's state of mind. It calls for information protected by the reporter's privilege.                                          |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for ~ it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's – he is not a party 13:37:58 16 to this lawsuit. He's not planning on – there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially 20 legal conclusions and I'm going to instruct you 13:38:12 10 not to answer that, either. 21 Q. What did you say to Dr. Raimondo? 22 MR. KESLAR: Asked and answered, but to 13 to him to be extent you have a different answer, go ahead. | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last? MR. KESLAR: That's undisclosed information. It really invades the reporter's state of mind. It calls for information protected by the reporter's privilege. I'm going to instruct you not to answer. |
| 7 MR. KESLAR: That's a 8 mischaracterization, and to the extent it calls 9 for it asks Mr. Hawk to explain what was said 10 to him, which is previously undisclosed 13:37:47 11 information, it's privileged, and you don't have 12 to answer that question. 13 Q. Are you going to testify about what you 14 said to Dr. Raimondo? 15 MR. KESLAR: He's he is not a party 13:37:58 16 to this lawsuit. He's not planning on there's 17 no reason for him to be testifying at this point 18 as he's not a party to this lawsuit. It's an 19 improper question. It calls for potentially 20 legal conclusions and I'm going to instruct you 13:38:12 10 not to answer that, either. 21 Q. What did you say to Dr. Raimondo? 22 MR. KESLAR: Asked and answered, but to                                                                     | 7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q. Okay. A. Maybe a little bit more. Q. Where were you standing in relation to Gibson's Bakery? A. Fairly close to the entrance. 13:54:48 Q. Did you talk to her actually in front of Gibson's Bakery? A. It might be slightly to the east. Q. Okay. So I'm bad with directions, so if you're looking at Gibson's Bakery, would that be to the left or to the right? A. To the left. Q. Okay. And how long did your conversation with her last? MR. KESLAR: That's undisclosed information. It really invades the reporter's state of mind. It calls for information protected by the reporter's privilege.                                          |

|                            | Page 134                                                                                                                                     |                | Page 136                                                                                                                             |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 1                          | into having a conversation with Dr. Raimondo?                                                                                                | 1              | A. Or slightly to the east.                                                                                                          |
| 2                          | MR, KESLAR: To the extent I'm going                                                                                                          | 2              | Q. Or slightly to the east, correct?                                                                                                 |
| 3                          | to object just to the extent it calls for                                                                                                    | · 3            | A. Yes.                                                                                                                              |
| 4                          | anything that was said, which I think is                                                                                                     | 4              | Q. You were taking pictures, correct?                                                                                                |
| 5                          | privileged information. 13:55:56                                                                                                             | 5              | A. Yes. 13:58:12                                                                                                                     |
| 6                          | To the extent it calls for your specific                                                                                                     | 6              | <ul> <li>Q. Meredith Raimondo approached you,</li> </ul>                                                                             |
| 7                          | conduct, you can answer, but I'm going to                                                                                                    | 7              | correct?                                                                                                                             |
| 8                          | instruct you not to answer beyond that.                                                                                                      | 8              | A. Yes.                                                                                                                              |
| 9                          | A. Would you mind repeating the question?                                                                                                    | 9              | Q. And she stood in front of you blocking                                                                                            |
| 10                         | Q. We'll ask our madam court reporter to 13:56:03                                                                                            | 10             | your ability to take pictures, correct? 13:58:21                                                                                     |
| 11                         | repeat it.                                                                                                                                   | 11             | A. Yes.                                                                                                                              |
| 12                         | (Record read.)                                                                                                                               | 12             | Q. What happened next?                                                                                                               |
| 13                         | A. Yes.                                                                                                                                      | 13             | A. I moved slightly to attempt to take more                                                                                          |
| 14                         | Q. Okay. What happened?                                                                                                                      | 14<br>15       | (photos.) Q. Okay. Now, which way did you move (13:58:33)                                                                            |
| 15                         | A. She approached me. 13:56:18                                                                                                               | 16             | slightly to try to take more pictures?                                                                                               |
| 16                         | Q. Um-hum. How did she approach you?                                                                                                         | 17             | A. Around her.                                                                                                                       |
| 17                         | <ul> <li>A. She walked up to me and stood directly<br/>in front of me where I was shooting photos.</li> </ul>                                | 18             | Q. Did you move to her right or to her                                                                                               |
| 18<br>19                   | Q. Okay. So you were using your camera to                                                                                                    | 19             | left?                                                                                                                                |
| 20                         | photograph the demonstrations? 13:56:41                                                                                                      | 20             | A. I don't recall. 13:58:46                                                                                                          |
| 21                         | A. Yes.                                                                                                                                      | 21             | Q. And how far around her did you move?                                                                                              |
| 22                         | Q. And she walked up to you, correct?                                                                                                        | 22             | A. A couple of feet.                                                                                                                 |
| 23                         | A. In front of me, yes.                                                                                                                      | 23             | Q. A couple of feet. By the way, what was                                                                                            |
| 24                         | Q. In front of you. When she walked in                                                                                                       | 24             | Meredith Raimondo wearing that day?                                                                                                  |
| 25                         | front of you, how far away was she from you? 13:56:49                                                                                        | 25             | A. I don't recall. 13:58:56                                                                                                          |
|                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                |                | Molnar Reporting Services, LLC (440) 340-6161                                                                                        |
| <u></u>                    | Page 135                                                                                                                                     |                | Page 137                                                                                                                             |
| 4                          |                                                                                                                                              | 1              | Q. Do you recall what shoes she had on?                                                                                              |
| 1<br>2                     | <ul><li>A. Directly, so as to block the shots.</li><li>Q. Okay. In terms of inches or feet, how</li></ul>                                    | 2              | A. No.                                                                                                                               |
| 3                          | far away was she?                                                                                                                            | 3              | Q. Do you recall anything about her                                                                                                  |
| 4                          | A. Feet.                                                                                                                                     | 4              | clothes?                                                                                                                             |
| 5                          | Q. Feet. Okay. How many feet? 13:57:05                                                                                                       | 5              | A. No. 13:59:05                                                                                                                      |
| 6                          | A. Again, pure speculation.                                                                                                                  | 6              | Q. Okay. Did she have a backpack with her?                                                                                           |
| 7                          | Q. Okay.                                                                                                                                     | 7              | A. I don't know.                                                                                                                     |
| 8                          | A. Maybe two.                                                                                                                                | 8              | Q. Did she have anything in her hands?                                                                                               |
| 9                          | Q. When she walked in front of you, did you                                                                                                  | 9              | A. I don't know.                                                                                                                     |
| 10                         | have the camera to your face or was it in your 13:57:18                                                                                      | 10             | Q. How would you describe her face? 13:59:18                                                                                         |
| 11                         | hands or by your side?                                                                                                                       | 11             | <ol> <li>I'm unclear what you're asking.</li> </ol>                                                                                  |
| 12                         | A. To my face.                                                                                                                               | 12             | Q. Sure. Did she – was she a blonde or a                                                                                             |
| 13                         | Q. Okay. So the camera was up to your face                                                                                                   | 13             | brunette or a redhead or something else?                                                                                             |
| 14                         | and she approached you. What happened next?                                                                                                  | 14             | A. You mean the hair on her head?                                                                                                    |
| 1.5                        | MR. KESLAR: And just to the extent that 13:57:40                                                                                             | 15             | Q. Yes. Okay. Can you describe her — 13:59:47                                                                                        |
| 16                         | it's such a broad question, if it calls for you                                                                                              | 16             | well, I'll restate the question, too, yes. So                                                                                        |
| 17                         | to provide any information about what might have                                                                                             | 17             | strike that.                                                                                                                         |
| 18                         | been said to you or what you said, we're                                                                                                     | 18             | Can you describe her physical                                                                                                        |
|                            | asserting privilege on that and I'll instruct you not to answer, not to answer the question, 13:57:50                                        | 19             | appearance?  A. She's a white female of approximate 13:59:58                                                                         |
| 19                         | ment to anaryon ment to anaryon the displican [4.3.7.3]                                                                                      | 20             | A. She's a white female of approximate 13:59:58 middle age. Brown hair.                                                              |
| 20                         |                                                                                                                                              | 21             |                                                                                                                                      |
| 20<br>21                   | because it's stated so broadly.                                                                                                              | 21             |                                                                                                                                      |
| 20<br>21<br>22             | because it's stated so broadly.  So don't answer the question.                                                                               | 22             | Q. What do you consider to be middle age?                                                                                            |
| 20<br>21<br>22<br>23       | because it's stated so broadly.  So don't answer the question.  MR. HOLMAN: The question is not broad.                                       | 22<br>23       | <ul><li>Q. What do you consider to be middle age?</li><li>A. Anywhere between 30 and 60.</li></ul>                                   |
| 20<br>21<br>22<br>23<br>24 | because it's stated so broadly. So don't answer the question. MR. HOLMAN: The question is not broad. Q. So you've testified that you were in | 22<br>23<br>24 | <ul><li>Q. What do you consider to be middle age?</li><li>A. Anywhere between 30 and 60.</li><li>Q. Does she wear glasses?</li></ul> |
| 20<br>21<br>22<br>23       | because it's stated so broadly.  So don't answer the question.  MR. HOLMAN: The question is not broad.                                       | 22<br>23       | <ul><li>Q. What do you consider to be middle age?</li><li>A. Anywhere between 30 and 60.</li></ul>                                   |

| Page 138                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Page 140                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| I'm unclear of whether she was wearing them at                                                                                                                                                                                                                                                           | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                          | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Q. Did Dr. Raimondo say anything to you as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                                                                                                                                                                                                          | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | she approached you and blocked your view the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                                                                                                                                                                          | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | first time?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| *.                                                                                                                                                                                                                                                                                                       | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MR. KESLAR: Same objection. 14:02:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                          | 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                                                                                                                                                                                                          | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Q. Did Dr. Raimondo say anything to you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                          | 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | when she blocked your view a second time?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                                                                                                                                                                                                          | 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                                                                                                                                                                                                                                          | 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Same instruction. Do not answer. 14:02:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| •                                                                                                                                                                                                                                                                                                        | 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Q. So when Dr. Raimondo blocked you a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                                                                                                                                                                                                          | 12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | second time, what did you do?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                          | 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | A. At that point in time, we had a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                          | 14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | conversation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                          | 15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Q. Okay. Who spoke first? 14:03:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                          | 16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | MR. KESLAR: Part of the news-gathering                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| •                                                                                                                                                                                                                                                                                                        | 17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | process. The question calls for privileged                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                                                                                                                                                                                                          | 18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                                                                                                                                                                          | 19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Don't answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| === : : :                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Q. So you had a conversation with 14:03:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Dr. Raimondo, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                          | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                                                                                                                                                                                                                          | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Q. Okay. Who spoke first?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                                                                                                                                                                                                          | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MR, KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                                                                                                                                                                                                                                          | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | I'm going to instruct you not to answer, 14:03:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                                                                                                                                                                                                                          | "                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Wilding Replicing Services, Ede (110) 510 0101                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Page 139                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Page 141                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Q. Okay. So you don't know what she had                                                                                                                                                                                                                                                                  | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <ul> <li>Q. So as part of this conversation, what</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| with her, if anything?                                                                                                                                                                                                                                                                                   | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | did you say to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <ul> <li>A. I didn't conduct any kind of questioning</li> </ul>                                                                                                                                                                                                                                          | 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MR. KESLAR: Again, it calls for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| along those lines.                                                                                                                                                                                                                                                                                       | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | testimony that's privileged because it was part                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Q. No, and I understand. 14:01:29                                                                                                                                                                                                                                                                        | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | of the news-gathering process. 14:03:35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                          | 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                                                                                                                                                                                                          | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <ul> <li>Q. As part of this conversation, did</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| on her person?                                                                                                                                                                                                                                                                                           | В                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Dr. Raimondo speak to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| A. I don't know what she was carrying.                                                                                                                                                                                                                                                                   | 9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                          | 10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Q. Okay. What did Dr. Raimondo say to you? 14:03:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| allegedly blocked your view and then you moved to                                                                                                                                                                                                                                                        | 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| the side. What happened after that?                                                                                                                                                                                                                                                                      | 12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                                                                                                                                                                                                          | 13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Q. During this conversation, did you speak                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Q. Okay. And how did she block you the                                                                                                                                                                                                                                                                   | 14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                          | 15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | A. Yes. 14:04:05                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| second time? 14:01:56                                                                                                                                                                                                                                                                                    | 1.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| second time? 14:01:56                                                                                                                                                                                                                                                                                    | 16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Q. Did she speak to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| second time? 14:01:56  A. Also using her body.                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <ul><li>Q. Did she speak to you?</li><li>A. Yes.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| second time? 14:01:56  A. Also using her body.  Q. Okay. And how close was she to you the                                                                                                                                                                                                                | 16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| second time? 14:01:56  A. Also using her body.  Q. Okay. And how close was she to you the second time she tried to block you?                                                                                                                                                                            | 16<br>17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| second time?  A. Also using her body.  Q. Okay. And how close was she to you the second time she tried to block you?  A. Again, within a matter of feet.                                                                                                                                                 | 16<br>17<br>18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <ul><li>A. Yes.</li><li>Q. How long did this exchange last?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| second time?  Also using her body.  Q. Okay. And how close was she to you the second time she tried to block you?  A. Again, within a matter of feet.  Q. Okay. Did she say strike that.  14:01:56  14:01:56  14:01:56                                                                                   | 16<br>17<br>18<br>19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | A. Yes. Q. How long did this exchange last? MR. KESLAR; Asked and answered. I'm going to assert the same objection. It's part of 14:04:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| second time?  A. Also using her body. Q. Okay. And how close was she to you the second time she tried to block you? A. Again, within a matter of feet. Q. Okay. Did she say — strike that. Did she say anything when she approached                                                                      | 16<br>17<br>18<br>19<br>20<br>21                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | A. Yes. Q. How long did this exchange last? MR. KESLAR; Asked and answered. I'm going to assert the same objection. It's part of 14:04:14 the reporter's privilege as the information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| second time?  A. Also using her body. Q. Okay. And how close was she to you the second time she tried to block you? A. Again, within a matter of feet. Q. Okay. Did she say — strike that. Did she say anything when she approached you the first time?                                                  | 16<br>17<br>18<br>19<br>20<br>21<br>22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | A. Yes. Q. How long did this exchange last? MR. KESLAR; Asked and answered. I'm going to assert the same objection. It's part of 14:04:14 the reporter's privilege as the information that's gathered or occurred during the process of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| second time?  A. Also using her body. Q. Okay. And how close was she to you the second time she tried to block you? A. Again, within a matter of feet. Q. Okay. Did she say — strike that. 14:02:11 Did she say anything when she approached you the first time?  MR. KESLAR: Objection. First Amendment | 16<br>17<br>18<br>19<br>20<br>21<br>22<br>23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | A. Yes. Q. How long did this exchange last? MR. KESLAR: Asked and answered. I'm going to assert the same objection. It's part of 14:04:14 the reporter's privilege as the information that's gathered or occurred during the process of reporting the news, and so I'm going to instruct                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| second time?  A. Also using her body. Q. Okay. And how close was she to you the second time she tried to block you? A. Again, within a matter of feet. Q. Okay. Did she say — strike that. Did she say anything when she approached you the first time?                                                  | 16<br>17<br>18<br>19<br>20<br>21<br>22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | A. Yes. Q. How long did this exchange last? MR. KESLAR; Asked and answered. I'm going to assert the same objection. It's part of 14:04:14 the reporter's privilege as the information that's gathered or occurred during the process of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| •                                                                                                                                                                                                                                                                                                        | I'm unclear of whether she was wearing them at the time.  Q. Okay. What was her height?  A. Shorter than me. Q. How tall are you?  A. Five foot ten, five foot eleven, somewhere in that range. Q. About how much shorter than you is she? A. A head or so, I believe. Q. And what do you consider to be a head or 14:00:47 so? A. (Indicating.) Maybe 18 inches, 12 inches. Q. Okay. So you believe that she may be about 18 inches shorter than you?  A. 18 to 12 inches shorter than me, possibly. Q. Thank you. Is her hair all brown or are there other colors? A. I don't know how she wears her hair. Q. Was she wearing a coat? A. I don't recall. Q. Did she have a cell phone with her? A. I don't know what she might have had with her.  14:01:19  Molnar Reporting Services, LLC (440) 340-6161  Page 139  Q. Okay. So you don't know what she had with her, if anything? A. I didn't conduct any kind of questioning along those lines. Q. No, and I understand. 14:01:29  My question is when you observed her and when you interacted with her, what did she have on her person? A. I don't know what she was carrying. Q. Okay. So she approached you and allegedly blocked your view and then you moved to the side. What happened after that? A. She moved again to block it. | I'm unclear of whether she was wearing them at the time.  Q. Okay. What was her height? A. Shorter than me. Q. How tall are you? A. Five foot ten, five foot eleven, somewhere in that range. Q. About how much shorter than you is she? A. A head or so, I believe. Q. And what do you consider to be a head or 14:00:47 so? A. (Indicating.) Maybe 18 inches, 12 inches. Q. Okay. So you believe that she may be about 18 inches shorter than me, possibly. Q. Thank you. Is her hair all brown or are there other colors? A. I don't know how she wears her hair. 14:01:11 Q. Was she wearing a coat? A. I don't recall. Q. Did she have a cell phone with her? A. I don't recall. Q. Did she have a cell phone with her? A. I don't know what she might have had with her. 14:01:19 Molnar Reporting Services, LLC (440) 340-6161  Page 139  Q. Okay. So you don't know what she had with her, if anything? A. I didn't conduct any kind of questioning along those lines. Q. No, and I understand. 14:01:29 5 My question is when you observed her and when you interacted with her, what did she have on her person? A. I don't know what she was carrying. 9 G. Okay. So she approached you and 14:01:43 10 allegedly blocked your view and then you moved to the side. What happened after that? A. She moved again to block it, |

|                                                                                                                                | Page 142                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                | Page 144                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                              | what you said to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1                                                                                                                              | Q. Okay. So what did you do after you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2                                                                                                                              | MR. KESLAR: So I understand your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2                                                                                                                              | stopped conversing with Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 3                                                                                                                              | question, are you saying testify today meaning at                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 3                                                                                                                              | <ul> <li>A. I remained on the scene and continued to</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4                                                                                                                              | this deposition?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 4                                                                                                                              | report.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5                                                                                                                              | MR. HOLMAN: Yes, yeah. 14:04:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 5                                                                                                                              | Q. Okay. Did you continue to take pictures 14:06:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 6                                                                                                                              | MR. KESLAR: Or do you mean at trial,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6                                                                                                                              | from the spot that you were at?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 7                                                                                                                              | should that ever happen?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 7                                                                                                                              | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8                                                                                                                              | MR. HOLMAN: I'm saying today, and I'll                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 8                                                                                                                              | Q. Okay. Did you move away from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9                                                                                                                              | restate the question. Yeah.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9                                                                                                                              | Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10                                                                                                                             | Q. So what did Dr. Raimondo – strike that. 14:04:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 10                                                                                                                             | A. No. 14:06:37                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11                                                                                                                             | So what did you say to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 11                                                                                                                             | Q. When your conversation with Dr. Raimondo                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12                                                                                                                             | MR. KESLAR: I'm going to instruct you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 12                                                                                                                             | stopped, did she move away from you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 13                                                                                                                             | not to answer based on the First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 13                                                                                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 14                                                                                                                             | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 14                                                                                                                             | Q. Where did she go?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 15                                                                                                                             | MR, HOLMAN: I will instruct the madam 14:04:55                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 15                                                                                                                             | A. I wouldn't be able to tell you. 14:06:51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 16                                                                                                                             | court reporter to instruct the witness to answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 16                                                                                                                             | I'm sorry. She did stay on the scene                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 17                                                                                                                             | the question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 17                                                                                                                             | for quite some time.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 18                                                                                                                             | THE REPORTER: Would you please answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 18                                                                                                                             | Q. Okay. Did she attempt to block your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 19                                                                                                                             | the question, sir?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 19                                                                                                                             | view again?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 20                                                                                                                             | MR. KESLAR: I'm going to instruct him 14:05:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 20                                                                                                                             | A. Is your question whether she attempted 14:07:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 21                                                                                                                             | not to based on the first amendment privilege,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 21                                                                                                                             | to block the view after she left initially?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 22                                                                                                                             | which if not asserted will be waived.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 22                                                                                                                             | Q. Let me restate the question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 23                                                                                                                             | Q. What did Dr. Raimondo say to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 23                                                                                                                             | A. Sure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 24                                                                                                                             | MR. KESLAR: Again, I'm going to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 24                                                                                                                             | Q. So you've testified that initially,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 25                                                                                                                             | instruct you not to answer based on the First 14:05:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 25                                                                                                                             | Dr. Raimondo approached you and blocked your view 14:07:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1                                                                                                                              | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | i                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                | Page 143                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                | Page 143                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1                                                                                                                              | Page 145                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1                                                                                                                              | Amendment privilege. It's undisclosed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1 2                                                                                                                            | Page 145 as you were taking pictures, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2                                                                                                                              | Amendment privilege. It's undisclosed information gathered during the news reporter —                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2                                                                                                                              | Page 145 as you were taking pictures, correct? A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3                                                                                                                         | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2 3                                                                                                                            | Page 145 as you were taking pictures, correct? A. Yes. Q. You've also testified that you moved                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2<br>3<br>4                                                                                                                    | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4                                                                                                                    | Page 145 as you were taking pictures, correct? A. Yes. Q. You've also testified that you moved several feet away, and that in response, she                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2<br>3<br>4<br>5                                                                                                               | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer  14:05:21                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5                                                                                                               | Page 145 as you were taking pictures, correct? A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a 14:07:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6                                                                                                          | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer the question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6                                                                                                          | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  (14:07:54  A. She didn't attempt to use her body to do                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  A. She didn't attempt to use her body to do it, no.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54 A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?                                                                                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should  14:08:06                                                                                                                                                                                                                                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should not be taking photos.                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54 A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view? A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54 A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view? A. She attempted to argue that we should not be taking photos?  14:08:06  14:08:06                                                                                                                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo,                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54 A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view? A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos? A. During the conversation that we had                                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo, correct? 14:05:55                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos?  A. During the conversation that we had after she attempted to block my view.  14:08:26                                                                                                                                    |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo, correct? 14:05:55  A. Yes, sir.                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos?  A. During the conversation that we had after she attempted to block my view.  Q. Okay. So during your conversation with                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo, correct? 14:05:55  A. Yes, sir.  Q. I presume, correct me if I'm wrong, but                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  (14:07:54) A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view? A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos? A. During the conversation that we had after she attempted to block my view.  (14:08:26) Q. Okay. So during your conversation with her where she was trying to block your view, she                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo, correct? 14:05:55  A. Yes, sir.  Q. I presume, correct me if I'm wrong, but at some point, you stopped conversing with her,          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos?  A. During the conversation that we had after she attempted to block my view.  Q. Okay. So during your conversation with her where she was trying to block your view, she said that you should not be taking pictures?     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo, correct? 14:05:55  A. Yes, sir.  Q. I presume, correct me if I'm wrong, but at some point, you stopped conversing with her, correct? | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos?  A. During the conversation that we had after she attempted to block my view.  Q. Okay. So during your conversation with her where she was trying to block your view, she said that you should not be taking pictures?  A. Yes, sir. |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Amendment privilege. It's undisclosed information gathered during the news reporter — reporting process.  MR. HOLMAN: I'm going to direct the court reporter to direct the witness to answer 14:05:21 the question.  THE REPORTER: Sir, would you please answer the question.  MR. KESLAR: And again, I'm going to instruct you not to answer based on your First 14:05:28 Amendment privilege, which if not asserted would be waived.  Q. So at some point, did your conversation with Dr. Raimondo end?  A. Yes. 14:05:42  Q. How did it end?  A. I'm unclear what you're asking.  Q. Okay. So it's your testimony today that you had a conversation with Dr. Raimondo, correct? 14:05:55  A. Yes, sir.  Q. I presume, correct me if I'm wrong, but at some point, you stopped conversing with her,          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | as you were taking pictures, correct?  A. Yes. Q. You've also testified that you moved several feet away, and that in response, she moved several feet away to block your view a second time, correct?  A. Yes. Q. So my question simply is did Meredith Raimondo that day attempt to block your view a third time?  14:07:54  A. She didn't attempt to use her body to do it, no. Q. Did she attempt to use anything to block your view?  A. She attempted to argue that we should not be taking photos. Q. So when did she say that you should not be taking photos?  A. During the conversation that we had after she attempted to block my view.  Q. Okay. So during your conversation with her where she was trying to block your view, she said that you should not be taking pictures?     |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Page 146     |                                                          | Page 148                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 MR. KESLAR: I would instruct you only                                                                                                                                                                                                                                                                                                                                                                                                                                         | y)           | 1                                                        | Q. Okay. Is there any reason why you would                                                                                                                                                                                                                                                                                                          |
| to answer to the extent that the question                                                                                                                                                                                                                                                                                                                                                                                                                                       | _            | 2                                                        | not be able to recall today whether you had more                                                                                                                                                                                                                                                                                                    |
| 3 pertains to exactly the statement you just made                                                                                                                                                                                                                                                                                                                                                                                                                               | e.           | 3                                                        | than one contact with Dr. Raimondo on November                                                                                                                                                                                                                                                                                                      |
| Anything about — otherwise about your                                                                                                                                                                                                                                                                                                                                                                                                                                           | <del>_</del> | 4                                                        | 10, 2016?                                                                                                                                                                                                                                                                                                                                           |
| conversation, I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                  | 14:08:59     | 5                                                        | A. Is there any reason – I'm sorry. Can 14:11:41                                                                                                                                                                                                                                                                                                    |
| 6 answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              | 6                                                        | you ask the question again?                                                                                                                                                                                                                                                                                                                         |
| 7 A. She argued that we didn't have the right                                                                                                                                                                                                                                                                                                                                                                                                                                   |              | 7                                                        | Q. Sure. So you don't know if you spoke to                                                                                                                                                                                                                                                                                                          |
| 8 to take photos of the protest.                                                                                                                                                                                                                                                                                                                                                                                                                                                | •            | 8                                                        | Dr. Raimondo a second time that day, correct?                                                                                                                                                                                                                                                                                                       |
| 9 Q. Okay. What did she say exactly?                                                                                                                                                                                                                                                                                                                                                                                                                                            |              | 9                                                        | <ul> <li>A. I don't recall speaking to her that day,</li> </ul>                                                                                                                                                                                                                                                                                     |
| 10 A. I don't know. 14:09                                                                                                                                                                                                                                                                                                                                                                                                                                                       | :20          | 10                                                       | no. 14:11:52                                                                                                                                                                                                                                                                                                                                        |
| Q. Can you paraphrase what she said?                                                                                                                                                                                                                                                                                                                                                                                                                                            |              | 11                                                       | Q. Okay.                                                                                                                                                                                                                                                                                                                                            |
| 12 MR. KESLAR: And I would object on the                                                                                                                                                                                                                                                                                                                                                                                                                                        | he           | 12                                                       | A. Again.                                                                                                                                                                                                                                                                                                                                           |
| 13 basis of the First Amendment privilege to                                                                                                                                                                                                                                                                                                                                                                                                                                    |              | 13                                                       | <ul> <li>Q. After your first conversation, did</li> </ul>                                                                                                                                                                                                                                                                                           |
| 14 anything beyond what you already testified to.                                                                                                                                                                                                                                                                                                                                                                                                                               | •            | 14                                                       | Dr. Raimondo attempt to block your view again?                                                                                                                                                                                                                                                                                                      |
| 15 So I would instruct you not to answer it to the                                                                                                                                                                                                                                                                                                                                                                                                                              |              | 15                                                       | A. I'm sorry. One more time? 14:12:04                                                                                                                                                                                                                                                                                                               |
| extent that it exceeds what you've already                                                                                                                                                                                                                                                                                                                                                                                                                                      |              | 16                                                       | <ul> <li>Q. Sure. You've testified about your</li> </ul>                                                                                                                                                                                                                                                                                            |
| 17 testified to.                                                                                                                                                                                                                                                                                                                                                                                                                                                                |              | 17                                                       | conversation with Dr. Raimondo, correct?                                                                                                                                                                                                                                                                                                            |
| 18 Q. Is there anything you can add about her                                                                                                                                                                                                                                                                                                                                                                                                                                   | •            | 18                                                       | A. Yes.                                                                                                                                                                                                                                                                                                                                             |
| 19 alleged statement that you should not be takin                                                                                                                                                                                                                                                                                                                                                                                                                               |              | 19                                                       | <ul> <li>Q. And I should probably say you have</li> </ul>                                                                                                                                                                                                                                                                                           |
| 20 photos? 14:09:4'                                                                                                                                                                                                                                                                                                                                                                                                                                                             |              | 20                                                       | testified in part to your conversation and you 14:12:13                                                                                                                                                                                                                                                                                             |
| 21 MR, KESLAR: I'm going to instruct you                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1            | 21                                                       | have not testified in full based upon the                                                                                                                                                                                                                                                                                                           |
| not to answer that question based on the First                                                                                                                                                                                                                                                                                                                                                                                                                                  |              | 22                                                       | assertion of privilege.                                                                                                                                                                                                                                                                                                                             |
| 23 Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |              | 23                                                       | So my question is after Dr. Raimondo                                                                                                                                                                                                                                                                                                                |
| 24 MR, HOLMAN: Okay. Would you inst                                                                                                                                                                                                                                                                                                                                                                                                                                             | ruct         | 24                                                       | allegedly blocked your view during that                                                                                                                                                                                                                                                                                                             |
| 25 the witness to answer the question?                                                                                                                                                                                                                                                                                                                                                                                                                                          | 14:10:01     | 25                                                       | conversation, did she attempt to do so again 14:12:29                                                                                                                                                                                                                                                                                               |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 40) 340-6161 |                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Page 147     |                                                          | Page 149                                                                                                                                                                                                                                                                                                                                            |
| 1 THE REPORTER: Sir, would you please                                                                                                                                                                                                                                                                                                                                                                                                                                           | ·            | 1                                                        | later on during the day?                                                                                                                                                                                                                                                                                                                            |
| 2 answer the question?                                                                                                                                                                                                                                                                                                                                                                                                                                                          |              | 2                                                        | A. No.                                                                                                                                                                                                                                                                                                                                              |
| 3 MR. KESLAR: And I'm going to instruct                                                                                                                                                                                                                                                                                                                                                                                                                                         |              | 3                                                        | Q. Okay. Did you use any profanity with                                                                                                                                                                                                                                                                                                             |
| 4 you not to answer the question based on the Fin                                                                                                                                                                                                                                                                                                                                                                                                                               |              | 4                                                        | Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                       |
| 5 Amendment privilege, which if not asserted we                                                                                                                                                                                                                                                                                                                                                                                                                                 |              | 5                                                        | MR, KESLAR: Objection. That goes to 14:12:44                                                                                                                                                                                                                                                                                                        |
| 6 be waived.                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |              | 6                                                        | the reporter's privilege. The content of his                                                                                                                                                                                                                                                                                                        |
| 7 Q. So on how many occasions on Novembe                                                                                                                                                                                                                                                                                                                                                                                                                                        | т 10         | 7                                                        | conversation with Dr. Raimondo is nondisclosed                                                                                                                                                                                                                                                                                                      |
| 8 did you speak to Meredith Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                           | -            | 8                                                        | and it is a First Amendment privilege for that.                                                                                                                                                                                                                                                                                                     |
| 9 A. Once.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |              | 9                                                        | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                            |
| 10 Q. Okay. And that one occasion is the                                                                                                                                                                                                                                                                                                                                                                                                                                        | 14:10:31     | 10                                                       | Q. Did you call Dr. Raimondo any names? 14:12:56                                                                                                                                                                                                                                                                                                    |
| discussion that you've just described in part,                                                                                                                                                                                                                                                                                                                                                                                                                                  |              | 11                                                       | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                         |
| 12 correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |              | 12                                                       | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |              | 13                                                       | Q. Did Dr. Raimondo use any profanity with                                                                                                                                                                                                                                                                                                          |
| 13 A That is part of it. ves.                                                                                                                                                                                                                                                                                                                                                                                                                                                   |              | i                                                        | ·                                                                                                                                                                                                                                                                                                                                                   |
| 13 A. That is part of it, yes.  14 O Okay Is there another part of it?                                                                                                                                                                                                                                                                                                                                                                                                          |              | 14                                                       | vou?                                                                                                                                                                                                                                                                                                                                                |
| 14 Q. Okay. Is there another part of it?                                                                                                                                                                                                                                                                                                                                                                                                                                        | 14:10:46     | 14<br>15                                                 | you? MR. KESLAR: Same objection. 14:13:05                                                                                                                                                                                                                                                                                                           |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.                                                                                                                                                                                                                                                                                                                                                                                                  | 14;10:46     |                                                          |                                                                                                                                                                                                                                                                                                                                                     |
| <ul> <li>Q. Okay. Is there another part of it?</li> <li>A. The conversation exceeded that, yes.</li> <li>Q. Okay. Got it. And you are unwilling to</li> </ul>                                                                                                                                                                                                                                                                                                                   | 14;10:46     | 15                                                       | MR. KESLAR: Same objection. 14:13:05                                                                                                                                                                                                                                                                                                                |
| 14 Q. Okay. Is there another part of it? 15 A. The conversation exceeded that, yes. 16 Q. Okay. Got it. And you are unwilling to 17 testify about any more of that conversation?                                                                                                                                                                                                                                                                                                |              | 15<br>16                                                 | MR. KESLAR: Same objection. 14:13:05 Same instruction not to answer.                                                                                                                                                                                                                                                                                |
| 14 Q. Okay. Is there another part of it? 15 A. The conversation exceeded that, yes. 16 Q. Okay. Got it. And you are unwilling to 17 testify about any more of that conversation? 18 MR. KESLAR: I'm going to instruct you                                                                                                                                                                                                                                                       |              | 15<br>16<br>17<br>18                                     | MR. KESLAR: Same objection. 14:13:05 Same instruction not to answer. Q. Did Dr. Raimondo call you any names? MR. KESLAR: Same instruction – same                                                                                                                                                                                                    |
| 14 Q. Okay. Is there another part of it? 15 A. The conversation exceeded that, yes. 16 Q. Okay. Got it. And you are unwilling to 17 testify about any more of that conversation? 18 MR. KESLAR: I'm going to instruct you 19 not to answer based on the privilege that I've                                                                                                                                                                                                     |              | 15<br>16<br>17                                           | MR. KESLAR: Same objection. 14:13:05 Same instruction not to answer. Q. Did Dr. Raimondo call you any names?                                                                                                                                                                                                                                        |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.  Q. Okay. Got it. And you are unwilling to testify about any more of that conversation?  MR. KESLAR: I'm going to instruct you not to answer based on the privilege that I've asserted for you today and the instructions I've                                                                                                                                                                   |              | 15<br>16<br>17<br>18<br>19<br>20                         | MR. KESLAR: Same objection. 14:13:05 Same instruction not to answer. Q. Did Dr. Raimondo call you any names? MR. KESLAR: Same instruction – same instruction not to answer. Same objection,                                                                                                                                                         |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.  Q. Okay. Got it. And you are unwilling to testify about any more of that conversation?  MR. KESLAR: I'm going to instruct you not to answer based on the privilege that I've asserted for you today and the instructions I've given you not to answer.                                                                                                                                          |              | 15<br>16<br>17<br>18<br>19<br>20<br>21                   | MR. KESLAR: Same objection. 14:13:05 Same instruction not to answer. Q. Did Dr. Raimondo call you any names? MR. KESLAR: Same instruction – same instruction not to answer. Same objection, excuse me. 14:13:11 Same instruction not to answer.                                                                                                     |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.  Q. Okay. Got it. And you are unwilling to testify about any more of that conversation?  MR. KESLAR: I'm going to instruct you not to answer based on the privilege that I've asserted for you today and the instructions I've given you not to answer.  Q. Did you have any other contact of any                                                                                                |              | 15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | MR. KESLAR: Same objection.  Same instruction not to answer.  Q. Did Dr. Raimondo call you any names?  MR. KESLAR: Same instruction – same instruction not to answer. Same objection, excuse me.  14:13:05  14:13:05  14:13:05  14:13:05                                                                                                            |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.  Q. Okay. Got it. And you are unwilling to testify about any more of that conversation?  MR. KESLAR: I'm going to instruct you not to answer based on the privilege that I've asserted for you today and the instructions I've given you not to answer.  Q. Did you have any other contact of any kind with Meredith Raimondo after your                                                         |              | 15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. KESLAR: Same objection.  Same instruction not to answer.  Q. Did Dr. Raimondo call you any names?  MR. KESLAR: Same instruction – same instruction not to answer. Same objection, excuse me.  Same instruction not to answer.  Q. Did you touch Dr. Raimondo?  A. Not to my recollection, no.                                                   |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.  Q. Okay. Got it. And you are unwilling to testify about any more of that conversation?  MR. KESLAR: I'm going to instruct you not to answer based on the privilege that I've asserted for you today and the instructions I've given you not to answer.  Q. Did you have any other contact of any kind with Meredith Raimondo after your conversation with her?                                  | 14:11:03     | 15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | MR. KESLAR: Same objection.  Same instruction not to answer.  Q. Did Dr. Raimondo call you any names?  MR. KESLAR: Same instruction – same instruction not to answer. Same objection, excuse me.  14:13:11  Same instruction not to answer.  Q. Did you touch Dr. Raimondo?  A. Not to my recollection, no.  Q. Okay. Did you assault Dr. Raimondo? |
| Q. Okay. Is there another part of it?  A. The conversation exceeded that, yes.  Q. Okay. Got it. And you are unwilling to testify about any more of that conversation?  MR. KESLAR: I'm going to instruct you not to answer based on the privilege that I've asserted for you today and the instructions I've given you not to answer.  Q. Did you have any other contact of any kind with Meredith Raimondo after your conversation with her?  A. I don't recall any, no. 14:1 |              | 15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. KESLAR: Same objection.  Same instruction not to answer.  Q. Did Dr. Raimondo call you any names?  MR. KESLAR: Same instruction – same instruction not to answer. Same objection, excuse me.  14:13:11  Same instruction not to answer.  Q. Did you touch Dr. Raimondo?  A. Not to my recollection, no.  Q. Okay. Did you assault Dr. Raimondo? |

| <u> </u> | Page 150                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |    | Page 152                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1        | calls for a legal conclusion, which he's not                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1  | more students?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2        | qualified to provide.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2  | A. The behavior of the students was                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3        | Q. Do you know what an assault is?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3  | confrontational. I wouldn't say that I was in a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4        | A. I know that there's a legal definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 4  | one-on-one confrontation with anyone.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 5        | and a colloquial definition. 14:13:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 5  | Q. Okay. Would you say that they were in a 14:15:46                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 6        | Q. Okay. What's the colloquial definition?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 6  | confrontation with you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 7        | A. To beat someone.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7  | A. I would say that their behavior was                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8        | Q. Okay. Did you assault Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 8  | confrontational to everyone with a camera                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9  | especially.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10       | Q. Okay, Did Dr. Raimondo touch you? 14:13:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 10 | Q. Okay. So I want to focus like a laser 14:15:53                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 11       | A. I don't recall whether she did.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 11 | beam on that moment when Dr. Raimondo approached                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 12       | Q. Okay. If she did touch you, that's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 12 | you, okay?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 13       | something you would remember, right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 13 | A. All right.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 14       | A. Not necessarily.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 14 | Q. I want to exclude every other moment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 15       | Q. Okay. If she touched you during the 14:14:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 15 | But let's focus on that moment when Dr. Raimondo 14:16:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 16       | course of this conversation, would that have been                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 16 | approached you, okay?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 17       | offensive to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 17 | A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 18       | A. Likely not.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 18 | Q. What was going on?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 19       | Q. Okay. Did Dr. Raimondo assault you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 19 | A. The crowd was very, very upset. By the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 20       | A. No. 14:14:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 20 | crowd, I mean the protestors. They were yelling 14:16:13                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 21       | Q. Did you contact the police because of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 21 | and screaming and they were extremely unhappy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 22       | anything that was said or occurred during your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 22 | that the camera was there.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 23       | conversation with Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 23 | Q. Was that unhappiness directed to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 24       | MR. KESLAR; Objection. It goes to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 24 | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 24<br>25 | reporting process, what he may have or may have 14:14:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 25 | Q. Okay. At that moment when Dr. Raimondo 14:16:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 25       | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 23 | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|          | Page 151                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |    | Page 153                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1        | not done during his reporting on this incident,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1  | approached you, how many individuals were                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2        | so I'm going to instruct you not to answer to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2  | expressing their unhappiness with your taking                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3        | extent it's nondisclosed in your news articles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 3  | pictures?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4        | I'll instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 4  | A. Many.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5        | Q. Did you threaten Dr. Raimondo in any 14:14:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 5  | Q. Many? Could you estimate the number for 14:16:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 6        | way?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6  | me?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 7        | MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 7  | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8        | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 8  | <ul> <li>Q. Okay. Were there a thousand people</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9        | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 9  | confronting you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10       | Q. Did Dr. Raimondo threaten you in any 14:14:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 10 | A. No. 14:16:49                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 11       | way?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 11 | Q. Okay. Ten?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12       | MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 12 | A. At least.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13       | privilege,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 13 | Q. Okay. Again, at the moment that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 14       | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 14 | Dr. Raimondo was approaching you, what were they                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 15       | Q. So at the time that Dr. Raimondo first 14:14:55                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 15 | saying to you? 14:17:01                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 16       | approached you, you were involved in a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 16 | MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 17       | confrontation with one or more of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 17 | privilege. Reporting privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 18       | demonstrators; is that true?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 18 | You don't have to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 19       | A. Can you tell me what you're thinking of?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 19 | Q. As Dr. Raimondo approached you and the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 20       | Q. Sure. I'll restate the question. 14:15:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 20 | students were confronting you, what did you say 14:17:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 21       | So you've testified that Dr. Raimondo                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 21 | to them?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 22       | approached you, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 22 | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 23       | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 23 | You don't have to answer that. Under                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 24       | Q. At that time, were you involved in a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 24 | the First Amendment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|          | discussion or even a confrontation with one or 14:15:29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 25 | Q. Did you call the police that day? 14:17:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| / h      | PROPERTY OF A LANGE OF THE PARTY OF THE PART |    | The state of the s |
| 25       | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | ľ  | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|    | Page 154                                                                       |          | Page 156                                                                                      |
|----|--------------------------------------------------------------------------------|----------|-----------------------------------------------------------------------------------------------|
| 1  | MR. KESLAR: Again, same objection. To                                          | 1        | Q. Okay. Did anyone spit at you?                                                              |
| 2  | the extent it calls for his reporting on this                                  | 2        | A. Yes, there were a couple people who spit                                                   |
| 3  | incident, methods he may or may not have used in                               | 3        | at — in my direction.                                                                         |
| 4  | gathering news information, I'm asserting First                                | 4        | Q. Okay. Were they spitting at you?                                                           |
| 5  | Amendment privilege and instructing you not to 14:17:34                        | . 5      | A. I would assume. It was in my direction. 14:19:51                                           |
| 6  | answer.                                                                        | 6        | Q. Okay. How many people spat at you?                                                         |
| 7  | Q. Did any of the protestors threaten you                                      | 7        | A. It's unclear.                                                                              |
| 8  | with bodily harm?                                                              | 8        | Q. Are we talking about more than one?                                                        |
| 9  | A. Yes.                                                                        | 9        | A. Yes.                                                                                       |
| 10 | Q. Okay. What was the threat? 14:17:44                                         | 10       | Q. You've testified that there were 250 14:20:04                                              |
| 11 | A. General threats coming from various                                         | 11       | people that made up this group when you initially                                             |
| 12 | students.                                                                      | 12       | arrived. Did all 250 people spit at you?                                                      |
| 13 | Q. Okay. What's a general threat? Or                                           | 13       | MR. KESLAR: I'll object just as a                                                             |
| 14 | strike that.                                                                   | 14       | mischaracterization of the amount of people                                                   |
| 15 | What precisely did the protestors say in 14:17:56                              | 15       | there. 14:20:20                                                                               |
| 16 | threatening you?                                                               | 16       | To the extent you can answer, go ahead.                                                       |
| 17 | MR. KESLAR: I'm going to assert a First                                        | 17       | A. Everyone present did not spit at me, no.                                                   |
| 18 | Amendment privilege on the precise language used                               | 18       | Q. Okay. Can you estimate for me, because                                                     |
| 19 | as it was undisclosed information not included in                              | 19       | you were there and I wasn't, how many individuals                                             |
| 20 | his reporting on this incident. Thus, it carries 14:18:17                      | 20       | spat in your direction, to use your phrase? 14:20:30                                          |
| 21 | with it a First Amendment privilege.                                           | 21       | A. Three or four.                                                                             |
| 22 | So I'm going to instruct you not to                                            | 22       | Q. Three or four. How far away were those                                                     |
| 23 | answer.                                                                        | 23       | individuals when they spat in your direction?                                                 |
| 24 | Q. Do you recall the specific threats that                                     | 24       | A. (15 or 20 feet.)                                                                           |
| 25 | were made to you? 14:18:23                                                     | 25       | Q. Okay. So 15 or 20 feet. That's 14:20:47                                                    |
|    | Molnar Reporting Services, LLC (440) 340-6161                                  | 1        | Molnar Reporting Services, LLC (440) 340-6161                                                 |
|    | Page 155                                                                       |          | Page 157                                                                                      |
| 1  | A. No.                                                                         | 1        | probably using this table as a guide, can you                                                 |
| 2  | <ul> <li>Q. Okay. So you don't recall verbatim the</li> </ul>                  | 2        | estimate for me what you consider to be 15 or 20                                              |
| 3  | threats that were directed to you, correct?                                    | 3        | feet?                                                                                         |
| 4  | A. That's correct, sir.                                                        | 4        | A. To about where Mr. Gibson is sitting.                                                      |
| 5  | Q. Can you generally describe the threats 14:18:37                             | 5        | Q. Okay. From where Mr. Gibson is sitting 14:21:08                                            |
| 6  | that you believe were directed to you?                                         | 6        | there to where you're sitting?                                                                |
| 7  | MR. KESLAR: I'm going to assert a First                                        | 7        | A. Yes, sir.                                                                                  |
| 8  | Amendment privilege on that. It's part of the                                  | 8        | Q. That's approximately 15 or 20 feet?                                                        |
| 9  | reporting process.                                                             | 9        | A. I may be off, but sure.                                                                    |
| 10 | I'm going to instruct you not to answer. 14:19:00                              | 10       | Q. Okay. 14:21:17                                                                             |
| 11 | Q. Did anyone try to take your camera away?                                    | 11       | A. That's about the distance.                                                                 |
| 12 | A. No.                                                                         | 12       | MR. HOLMAN: Can the videographer, can                                                         |
| 13 | Q. Did anyone damage your camera?                                              | 13       | you take a picture of where, show us where<br>Mr. Gibson is, please. And then span – pan back |
| 14 | A. No.                                                                         | 14       |                                                                                               |
| 15 | Q. Did anyone try to knock you down? 14:19:14                                  | 15       | to Mr. Hawk. 14:21:29  Q. So it's your sworn testimony that three                             |
| 16 | A. No, sir.                                                                    | 16<br>17 | or four people who were 15 to 20 feet away from                                               |
| 17 | Q. Did anyone try to assault you?                                              | 18       | you, or about the distance from Mr. Gibson there                                              |
| 18 | MR. KESLAR: Objection just on the legal                                        | 19       | to you, spat in your direction?                                                               |
| 19 | basis of assault. I think you've established a                                 | 20       | A. That's true. (14:21:56)                                                                    |
| 20 | colloquial term. 14:19:30                                                      | 20 21    |                                                                                               |
| 21 | Q. Sure. Let's use your colloquial                                             | 22       | Q. That's a pretty big distance, don't you think?                                             |
| 22 | definition.                                                                    | 22       |                                                                                               |
| 23 | Did anyone try to assault you?                                                 | 24       |                                                                                               |
| 24 | A. No one did exercise any physical                                            | 25       | Q. Yeah. A. I doubt that it was intended to actually 14:22:04                                 |
| 25 | violence against me. 14:19:42<br>Molnar Reporting Services, LLC (440) 340-6161 | 23       | Molnar Reporting Services, LLC (440) 340-6161                                                 |
|    |                                                                                |          |                                                                                               |

| Page 158                                                                                            | Page 160                                                                                    |
|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| 1 (hit me.)                                                                                         | perceive to be confrontational toward you,                                                  |
| 2 Q. Oh, okay. Did anyone say anything to                                                           | 2 correct?                                                                                  |
| 3 you as they were spitting at you?                                                                 | 3 A. Yes, sir.                                                                              |
| 4 MR. KESLAR: Objection. First Amendment                                                            | 4 Q. Do you know why those students were                                                    |
| 5 privilege. 14:22:16                                                                               | 5 acting in such a manner towards you? 14:24:14                                             |
| 6 Instruct you not to answer that.                                                                  | 6 MR. KESLAR: Objection. Goes to the                                                        |
| <ol> <li>Q. Did any of these three or four people</li> </ol>                                        | 7 editorial process and your state of mind. It's a                                          |
| 8 say anything to you as they spat in your                                                          | 8 First Amendment privilege, so I'm going to                                                |
| 9 direction?                                                                                        | 9 instruct you not to answer that question.                                                 |
| 10 A. Yes. 14:22:30                                                                                 | 10 Q. When you perceived these students to 14:24:27                                         |
| 11 Q. Okay. What did they say?                                                                      | be – and actually, were these students or were                                              |
| 12 MR. KESLAR: Objection on the First                                                               | 12 these protestors, do you know?                                                           |
| 13 Amendment privilege.                                                                             | 13 A. I can't speak for every single person 14 who was there.                               |
| 14 I'm going to instruct you not to answer.                                                         | 14 who was there. 15 Q. Okay. But let's focus again like a 14:24:38                         |
| Q. Did these individuals say anything to 14:22:36                                                   | 16 laser beam on the individuals who you believe                                            |
| 16 you as they were spitting in your direction?                                                     | 17 were acting in a confrontational manner towards                                          |
| 17 A. Yes. 18 Q. Okay. What did they say?                                                           | 18 you.                                                                                     |
| 18 Q. Okay. What did they say? 19 MR, KESLAR: Same objection. First                                 | 19 A. Okay.                                                                                 |
| 20 Amendment privilege. 14:22:50                                                                    | 20 Q. Okay? Do you have any knowledge as to 14:24:48                                        |
| 21 I'm going to instruct you not to answer.                                                         | whether these individuals were students or not?                                             |
| 22 Q. Did any of these three or four                                                                | 22 A. No.                                                                                   |
| 23 individuals say anything to you after they had                                                   | Q. Okay. Would you agree that they were                                                     |
| 24 spat in your direction?                                                                          | 24 demonstrators that day?                                                                  |
| 25 A. Yes. 14:22:58                                                                                 | 25 A Yes. 14:24:59                                                                          |
| Molnar Reporting Services, LLC (440) 340-6161                                                       | Molnar Reporting Services, LLC (440) 340-6161                                               |
| Page 159                                                                                            | Page 161                                                                                    |
|                                                                                                     |                                                                                             |
| 1 Q. Okay. What did they say?                                                                       | 1 Q. Did the students who you thought were 2 being confrontational tell you in any way that |
| 2 MR, KESLAR: Same objection. First                                                                 | 3 they did not want their pictures taken?                                                   |
| 3 Amendment privilege.                                                                              | 4 MR. KESLAR: There's a First Amendment                                                     |
| 4 I'm going to instruct you not to answer. 5 Q. Did any of these three individuals, 14:23:06        | 5 privilege to the response to that question, so 14:25:25                                   |
| 5 Q. Did any of these three individuals, 14:23:06 6 three or four individuals – strike that.        | 6 I'm going to instruct you not to answer.                                                  |
| 7 Any of these three or four individuals                                                            | 7 Q. Do you have any understanding as to why                                                |
| 8 threaten to harm you?                                                                             | 8 certain protestors were acting in a                                                       |
| 9 A. No.                                                                                            | 9 confrontational manner towards you?                                                       |
| 10 Q. Did any of these three or four 14:23:23                                                       | 10 MR. KESLAR: Again, to the extent that 14:25:39                                           |
| 11 individuals attempt to hurt you?                                                                 | that question calls for unpublished information                                             |
| 12 A. No.                                                                                           | 12 gathered in the news-reporting process, we're                                            |
| 13 Q. Did any of these three or four                                                                | 13 asserting First Amendment privilege. I'm going                                           |
| 14 individuals threaten to kill you?                                                                | 14 to instruct you not to answer.                                                           |
| 15 A. No. 14:23:34                                                                                  | 15 Q. Were you wearing your badge identifying 14:25:52                                      |
| 16 Q. Did any of these three or four                                                                | 1.6 yourself as a member of the media at all time?                                          |
| 17 individuals threaten to take your camera?                                                        | 17 A. No.                                                                                   |
| 18 A. I don't recall.                                                                               | 18 Q. When you arrived at the demonstration on                                              |
| 19 Q. Okay. Break your camera?                                                                      | 19 November 10, were you wearing it?                                                        |
| 20 A. Those specific individuals? 14:23:49                                                          | 20 A. I don't recall. 14:26:07                                                              |
| 21 Q. Um-hum.                                                                                       | 21 Q. Was Mr. Hutson wearing his media badge                                                |
| 22 A. I don't recall whether they did.                                                              | 22 when he arrived?                                                                         |
| 23 Q. Destroy your camera?                                                                          | 23 A. No.                                                                                   |
| 24 A. Again, I don't recall. 25 O. You've described some students who you 14:24:00                  | 24 Q. At some point, did you put on your<br>25 badge? 14:26:20                              |
|                                                                                                     | 40 UZUÇC: 14.4U.4U                                                                          |
| 25 Q. You've described some students who you 14:24:00 Molnar Reporting Services, LLC (440) 340-6161 | Molnar Reporting Services, LLC (440) 340-6161                                               |

|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                            | · · · · · · · · · · · · · · · · · · ·                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                  | Page 162                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                            | Page 164                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1                                                                                | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                          | A. I have no accurate way to answer that                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2                                                                                | Q. Okay. Were you wearing your media badge                                                                                                                                                                                                                                                                                                                                                                        | 2                                                                          | question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3                                                                                | at any point in time on November 10, 2016?                                                                                                                                                                                                                                                                                                                                                                        | 3                                                                          | Q. Okay. Again, you were there, right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4                                                                                | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                | 4                                                                          | A. Sure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5                                                                                | Q. Okay. Is it your practice when you're 14:26:34                                                                                                                                                                                                                                                                                                                                                                 | 5                                                                          | Q. I was not there, right? 14:28:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6                                                                                | covering an event that you believe to have some                                                                                                                                                                                                                                                                                                                                                                   | 6                                                                          | A. That's correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 7                                                                                | news value to actually wear a badge that                                                                                                                                                                                                                                                                                                                                                                          | 7                                                                          | Q. So can you estimate for me how much time                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8                                                                                | identifies yourself as a member of the news                                                                                                                                                                                                                                                                                                                                                                       | В                                                                          | and strike that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9                                                                                | media?                                                                                                                                                                                                                                                                                                                                                                                                            | 9                                                                          | For how long did Dr. Raimondo block your                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 10                                                                               | MR. KESLAR: Objection. It goes to the 14:26:50                                                                                                                                                                                                                                                                                                                                                                    | 10                                                                         | view the first time?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 11                                                                               | editorial process. It's a First Amendment                                                                                                                                                                                                                                                                                                                                                                         | 11                                                                         | A, I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 12                                                                               | privilege.                                                                                                                                                                                                                                                                                                                                                                                                        | 12                                                                         | Q. A few seconds?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 13                                                                               | I'll instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                  | 13                                                                         | A. Until I moved, yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 14                                                                               | Q. So to be clear, you don't remember                                                                                                                                                                                                                                                                                                                                                                             | 14                                                                         | Q. Okay. So is it your sworn testimony                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 15                                                                               | whether you were wearing your badge at any time 14:26:57                                                                                                                                                                                                                                                                                                                                                          | 15                                                                         | today that when Dr. Raimondo approached you the 14:28:58                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 16                                                                               | on November 10. Is that your sworn testimony                                                                                                                                                                                                                                                                                                                                                                      | 16                                                                         | first time, she blocked your view for a few                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 17                                                                               | today?                                                                                                                                                                                                                                                                                                                                                                                                            | 17                                                                         | seconds?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 18                                                                               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                           | 18                                                                         | A Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 19                                                                               | Q. Okay. Did you see Mr. Hutson wear his                                                                                                                                                                                                                                                                                                                                                                          | 19                                                                         | Q. And a few to me means two or three                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 20                                                                               | media badge at any time on November 10? 14:27:08                                                                                                                                                                                                                                                                                                                                                                  | 20                                                                         | seconds. Would you agree with that? 14:29:10                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 21                                                                               | A. No.                                                                                                                                                                                                                                                                                                                                                                                                            | 21                                                                         | A. Yeah. I wouldn't have stood there very                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 22                                                                               | Q. Did Meredith Raimondo touch you in any                                                                                                                                                                                                                                                                                                                                                                         | 22                                                                         | long,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 23                                                                               | offensive way when you were talking to her?                                                                                                                                                                                                                                                                                                                                                                       | 23                                                                         | Q. Okay. And then it's your sworn                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 24                                                                               | A. No.                                                                                                                                                                                                                                                                                                                                                                                                            | 24                                                                         | testimony that you moved and then Dr. Raimondo                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 25                                                                               | Q. Did Meredith Raimondo attempt to take 14:27:32                                                                                                                                                                                                                                                                                                                                                                 | 25                                                                         | blocked your view a second time, correct? 14:29:19                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 23                                                                               | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                     | 1                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                   | <del> </del>                                                               | 7 105                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                  | Page 163                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                            | Page 165                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1                                                                                | anything from you?                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                          | A. That's correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2                                                                                | A. Only opportunity.                                                                                                                                                                                                                                                                                                                                                                                              | 2                                                                          | Q. For how long did she block your view a                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3                                                                                | Q. Now, what does that mean?                                                                                                                                                                                                                                                                                                                                                                                      | 3                                                                          | second time?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4                                                                                | <ul> <li>A. Well, she deprived me of the ability to</li> </ul>                                                                                                                                                                                                                                                                                                                                                    | 4                                                                          | A. Another few seconds.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 5                                                                                | take photos at first. 14:27:48                                                                                                                                                                                                                                                                                                                                                                                    | 5                                                                          | Q. Another few seconds. Okay. Did you 14:29:27                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 6                                                                                | <ul> <li>Q. She deprived you of the ability. How</li> </ul>                                                                                                                                                                                                                                                                                                                                                       | 6                                                                          | complain that she was blocking your view?                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 7                                                                                | did she do that?                                                                                                                                                                                                                                                                                                                                                                                                  | 7                                                                          | MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8                                                                                | <ol> <li>A. By standing in front of the camera.</li> </ol>                                                                                                                                                                                                                                                                                                                                                        | 8                                                                          | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Q.                                                                               | Q. Okay. And for how long did she deprive                                                                                                                                                                                                                                                                                                                                                                         | 9                                                                          | You don't have to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 9                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10                                                                               | you of that opportunity? 14:28:01                                                                                                                                                                                                                                                                                                                                                                                 | 10                                                                         | Q. Did you ask Dr. Raimondo any questions? 14:29:40                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| ,                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                   | 11                                                                         | <ul><li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li><li>A. Yes.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10                                                                               | you of that opportunity? 14:28:01                                                                                                                                                                                                                                                                                                                                                                                 | 11<br>12                                                                   | <ul><li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li><li>A. Yes.</li><li>Q. Okay. What did you ask Dr. Raimondo?</li></ul>                                                                                                                                                                                                                                                                                                                                                                    |
| 10<br>11                                                                         | you of that opportunity? 14:28:01  A. Until I moved.                                                                                                                                                                                                                                                                                                                                                              | 11                                                                         | <ul> <li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo?<br/>MR, KESLAR: First Amendment privilege.</li> </ul>                                                                                                                                                                                                                                                                                                                     |
| 10<br>11<br>12                                                                   | you of that opportunity? 14:28:01  A. Until I moved.  Q. Okay. How much time are we talking                                                                                                                                                                                                                                                                                                                       | 11<br>12<br>13<br>14                                                       | <ul> <li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer</li> </ul>                                                                                                                                                                                                                                                                                 |
| 10<br>11<br>12<br>13                                                             | you of that opportunity? 14:28:01  A. Until I moved.  Q. Okay. How much time are we talking about?                                                                                                                                                                                                                                                                                                                | 11<br>12<br>13<br>14<br>15                                                 | <ul> <li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52 </li> </ul>                                                                                                                                                                                                                                                        |
| 10<br>11<br>12<br>13<br>14                                                       | you of that opportunity? 14:28:01  A. Until I moved.  Q. Okay. How much time are we talking about?  A. That she was directly in front of the                                                                                                                                                                                                                                                                      | 11<br>12<br>13<br>14                                                       | <ul> <li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer</li> </ul>                                                                                                                                                                                                                                                                                 |
| 10<br>11<br>12<br>13<br>14<br>15                                                 | you of that opportunity? 14:28:01  A. Until I moved. Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens? 14:28:09                                                                                                                                                                                                                                                        | 11<br>12<br>13<br>14<br>15                                                 | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo?</li> <li>MR. KESLAR: First Amendment privilege.</li> <li>I'm going to instruct you not to answer</li> <li>that question.</li> <li>14:29:52</li> <li>Q. What did Dr. Raimondo say in response to those questions?</li> </ul>                                                                                                                                                        |
| 10<br>11<br>12<br>13<br>14<br>15<br>16                                           | you of that opportunity? 14:28:01  A. Until I moved. Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens? 14:28:09 Q. Um-hum.                                                                                                                                                                                                                                             | 11<br>12<br>13<br>14<br>15<br>16                                           | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo?</li> <li>MR. KESLAR: First Amendment privilege.</li> <li>I'm going to instruct you not to answer</li> <li>that question.</li> <li>14:29:52</li> <li>Q. What did Dr. Raimondo say in response to</li> </ul>                                                                                                                                                                         |
| 10<br>11<br>12<br>13<br>14<br>15<br>16                                           | you of that opportunity?  A. Until I moved.  Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens?  Q. Um-hum.  A. A few seconds until I moved.  Q. Okay. So when she first approached you,                                                                                                                                                                                | 11<br>12<br>13<br>14<br>15<br>16                                           | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52 Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment privilege.</li> </ul>                                                                                                                                                   |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | you of that opportunity?  A. Until I moved. Q. Okay. How much time are we talking about? A. That she was directly in front of the lens? Q. Um-hum. A. A few seconds until I moved.                                                                                                                                                                                                                                | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52 Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment </li> </ul>                                                                                                                                                             |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | you of that opportunity?  A. Until I moved.  Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens?  Q. Um-hum.  A. A few seconds until I moved.  Q. Okay. So when she first approached you, she says, according to you — strike that.  When she first approached you, it's your 14:28:18                                                                                   | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52 Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment privilege. </li> </ul>                                                                                                                                                  |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | you of that opportunity?  A. Until I moved. Q. Okay. How much time are we talking about? A. That she was directly in front of the lens? Q. Um-hum. A. A few seconds until I moved. Q. Okay. So when she first approached you, she says, according to you — strike that. When she first approached you, it's your 14:28:18 testimony that she blocked your view once and                                           | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52 Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment privilege. I'm going to instruct you not to answer 14:29:58 </li> </ul>                                                                                                 |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | you of that opportunity?  A. Until I moved.  Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens?  Q. Um-hum.  A. A few seconds until I moved.  Q. Okay. So when she first approached you, she says, according to you — strike that.  When she first approached you, it's your 14:28:18 testimony that she blocked your view once and then a second time, correct?        | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | <ul> <li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52</li> <li>Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment privilege. I'm going to instruct you not to answer 14:29:58 those questions.</li> </ul>                                                               |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | you of that opportunity?  A. Until I moved. Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens?  Q. Um-hum.  A. A few seconds until I moved. Q. Okay. So when she first approached you, she says, according to you — strike that.  When she first approached you, it's your 14:28:18 testimony that she blocked your view once and then a second time, correct?  A. Yes. | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | <ul> <li>Q. Did you ask Dr. Raimondo any questions?</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52 Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment privilege. I'm going to instruct you not to answer 14:29:58 those questions. Q. Did you receive anything in writing from Dr. Raimondo?</li> </ul>                       |
| 10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | you of that opportunity?  A. Until I moved.  Q. Okay. How much time are we talking about?  A. That she was directly in front of the lens?  Q. Um-hum.  A. A few seconds until I moved.  Q. Okay. So when she first approached you, she says, according to you — strike that.  When she first approached you, it's your 14:28:18 testimony that she blocked your view once and then a second time, correct?        | 11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | <ul> <li>Q. Did you ask Dr. Raimondo any questions? 14:29:40</li> <li>A. Yes.</li> <li>Q. Okay. What did you ask Dr. Raimondo? MR. KESLAR: First Amendment privilege. I'm going to instruct you not to answer that question. 14:29:52</li> <li>Q. What did Dr. Raimondo say in response to those questions? MR. KESLAR: Again, the First Amendment privilege. I'm going to instruct you not to answer 14:29:58</li> <li>those questions.</li> <li>Q. Did you receive anything in writing from</li> </ul> |

| break. I think we've lost Dr. Raimondo?  MS. CROCKER: Yes.  MR. MOLMAN: We've lost Dr. Raimondo.  Okay. We're going to take a quick break, please.  VDDGORAPHER: Of the record, 2-99.  Recess taken)  NR. HOLMAN: We are back on the record.  Q. So Mr. Hawk, when you were taking to leave people taking pictures of you two?  Dr. Raimondo, do you know whether or not there were people taking pictures of you two?  MR. KESLAR: Objection. State of mind.  Editorial process. First Amendment privilege.  I instruct you not to enswer.  MR. HOLMAN: Club understand. What's the editorial part of this and what's the state of mind.  Dr. Raimondo, do you know whether or not a cortain fact took place. Were there people taking pictures of him and the state of mind.  Dr. Raimondo?  MR. KESLAR: Objection. State of mind.  Editorial process. First Amendment privilege.  I instruct you not to enswer.  MR. HOLMAN: I don't understand. What's the editorial part of this and what's the state of mind.  Dr. Raimondo?  MR. KESLAR: Mr. Holman, just since you just the mind is defined to so as well. First, this e-mail, I think it is deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you to be quoting portions of this deposition for you obtain that this 14:56:08  H. Holman We proper because the privilege.  I instruct you mot to enswer.  MR. HOLMAN: When we do make the state of mind.  The first population of this and what's the state of mind.  MR. HOLMAN: Who compare just the word of mind that the question obtained that the question obtained that the |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | T                                                                                                                              | - 160                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MR. CROCKER: Yes.  MR. HOLMAN: We've lost Dr. Raimondo.  Okay. We're going to take a quick break, please.  VIDEOGRAPHER: Off the record, 2:29.  MR. RESLAR: Own whether or not there (14:50:4)  Dr. Raimondo, do you know whether or not there were people taking pictures of you two?  MR. RESLAR: Own whether or not there were people taking pictures of you two?  MR. RESLAR: Own whether or not there were people taking pictures of you two?  MR. RESLAR: Own whether or not there were people taking pictures of you two?  MR. RESLAR: Own whether or not there were people taking pictures of him and the province of the state of mind.  MR. HOLMAN: I don't understand. What I st3:13 to fimind? Pm just asking for him to state whether or not a certain fact took place. Were there people taking pictures of him and phrases, and the provinces, which is many hounded than the Olio Shield Law.  MR. RESLAR: The way the question was planted by the many and the provinces of mind.  MR. RESLAR: The way the question was planted by the many and the provinces of mind.  MR. RESLAR: The way the question was planted by the many and the provinces of mind.  MR. HOLMAN: Where are the exhibits, and the provinces of mind.  MR. HOLMAN: Where are the exhibits are planted by the provinces of mind.  MR. HOLMAN: Where are the exhibits are provinces, the provinces of mind.  MR. HOLMAN: Where are the exhibits are provinces of mind.  MR. HOLMAN: Where are the exhibits are planted by the shield Law.  MR. HOLMAN: Where are the exhibits are provinces of mind.  MR. HOLMAN: Where are the exhibits are planted by the shield Law.  MR. HOLMAN: Where are the exhibits are planted by the shield Law.  MR. HOLMAN: Where are the state of mind.  MR. Holman the middle of this definition for the record in the state of mind.  MR. Holman the middle of this definition for the record the provinces of mindle e-mail and the provinces of mindle than the follo shield Law.  MR. Holman the middle of this definition for the record the provinces of mindle e-mail and the other poople with the  |                                                                                                                                | Page 166                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                | Page 168                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| MR, HOLMAN: We've load Dr. Raimondo.   4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | . 1                                                                                                                            | break. I think we've lost Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| A Clay We're going to take a quick break, please.   1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | i                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| VIDEOGRAPHER: Off the record, 2.29.  (Recors taken)  VIDEOGRAPHER: On the record, 2.50.  MR. HOLAMN: We are back on the record.  O. So Mr. Hawk, when you were taking to  Dr. Raimondo, do you know whether or not there  Were people taking pictures of you two?  MR. KESLAR: Objection. State of mind.  Beditorial process. First Amendment privilege.  Instruct you not to answer.  MR. HOLAMN: We are back on the record.  MR. HOLAMN: Graph to the state of mind.  MR. RESLAR: Objection. State of mind.  MR. RESLAR: The way the question was whether a prople taking pictures of him and the poly and its state of the proplet taking pictures of him and the proplet taking pictures of him and the poly and its state of the proplet taking pictures of him and the poly and its state.  MR. RESLAR: The way the question was phinsed, whether or not a certain fact took place. Were there people taking pictures of him and the poly and its state.  MR. RESLAR: The way the question was phinsed of the news articles.  MR. RESLAR: The way the question was phinsed of the news articles.  MR. RESLAR: The way the question was phinsed of the news articles.  MR. HOLMAN: Where are the exhibits, brief break? My compater just flows.  MR. HOLMAN: Where are the exhibits, brief break? My compater just flows.  MR. HOLMAN: Whore are the exhibits, and place the proplet graph to the proposition of record.)  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: No apology. No, of course.  MR. HOLMAN: No apology. No, of course.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Mere are the exhibits, and place the proposition of record.)  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Mere are the exhibits, and please the proposition of record.)  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Mere are the exhibits, and please the proposition of the please the p | 3                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Recess taken.)  Recess taken.) | 4                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| VDDFOGRAPHER: On the record, 2:50, MR. HOLMAN: We are back on the record. Q. So Mr. Hawk, when you were taking to Dr. Raimondo, do you know whether or not there is were people taking pictures of you two? MR. KFSLAR: Objection. State of mind. Beliforial process. First Amendment privilege. I instruct you not to arswor. MR. HOLMAN: I don't understand. What's the state of mind? This us asking for him to state of mind? This us asking for him to state of mind? This us asking for him to state there people taking pictures of him and the editional part of this and what's the state of mind? This us asking for him to state the whether or not a certain fact took place. Were there people taking pictures of him and the proper asking regards only Ohio Shield Law. The Ohio Shield Law concern the First Amendment privilege, which is much broader than the Ohio Shield Law. The Ohio Shield Law concern sources of information, not—which there's a to move that the First Amendment and the Ohio Constitution protects than just sources of information, not—which there's a to move that the First Amendment and the Ohio Constitution protects than just sources of information, not—which there's a to move that the First Amendment and the Ohio Constitution protects than just sources of information, which is protected by Ohio Shield Law.  The Ohio Shield Law concerns sources of information on which there's a to move that the First Amendment and the Ohio Constitution protects than just sources of information, which is protected by Ohio Shield Law.  The REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  The REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  The REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  The REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  The REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  The REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  The REPORTER: I'm sorry. Can we take a brief br | 5                                                                                                                              | ,—                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                                                                                                                              | J-00 Bm 1 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| MR. HOLMAN: Where are the exhibits, a brief break? Wy computer just froze.  MR. HOLMAN: Where are the exhibits, a brief break? Wy computer just froze.  MR. HOLMAN: Where are the exhibits, a brief break? Wy computer just froze.  MR. HOLMAN: Where are the exhibits, a brief break? Wy computer just froze.  MR. HOLMAN: Where are the exhibits, a lease of the whether cort of just ship the word or night not be deposition for you to be quoting portions of this e-mail that I had with a colleague of pure. In also think that's improper because the privilege.  I should be the collection just asking for him to state of mind? Thin just asking for him to state of mind? Thin just asking for him to state whether or not a certain fact took place. Were there people taking pictures of him and place whether people taking pictures of him and the private of mind? Thin in the state of mind.  22 prove asking regards only Ohio Shidel Law.  The Ohio Shidel Law concern sources of information, not which ther's a to more that 14:56:03 the First Amendment privilege, which is much broader than the Ohio Constitution protects than just sources of information, not which ther's a to more that 14:56:03 the First Amendment privilege, which is much broader than the Ohio Constitution protects than just sources of information, not which ther's a to more that 14:56:03 the First Amendment privilege, which is much broader than the Ohio Constitution protects than just sources of information, which is protected by Ohio Shield Law.  The Ohio Shield Law concerns sources of information, which is protected by Ohio Shield Law.  The Ohio Shield Law concerns sources of information, which is protected by Ohio Shield Law.  The Ohio Shield Law concerns sources of information, which is protected by Ohio Shield Law.  The Ohio Shield Law concerns sources of information, which is protected by Ohio Shield Law concerns sources of information protects than just sources of information, the there is the protection of the protection of the protection of the concerns of the pro | 6                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 9 Q. So Mr. Hawk, when you were talking to 10 Dr. Raimondo, do you know whether or not there 11 were people taking pictures of you itwo? 12 MR. KESLAR: Objection. State of mind. 13 Editorial process. First Amendment privilege. 14 Instruct you not to answer. 15 MR. HOLMAN: I don't understand. What's the state of or inite? They is state of their people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The people taking pictures of him and of the properties. The properties of the properties of the properties. The properties of the properties of the properties. The properties of the properties of the properties of the properties. The properties of the properties of the properties. The properties of the properties of the properties of the properties. The properties of the properties of the properties of the properties. The properties of the prope |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Dr. Ramondo, do you know whether or not there were people taking pictures of you two?  MR. KISLAR: Objection. State of mind.  Editorial process. First Amendment privilege.  Instruct you not to answer.  MR. HOLMAN: I don't understand, What's a state of mind? I'm just asking for him to state whether or not a certain fact took place. Were whether or not a certain fact took place. Were whether or not a certain fact took place. Were there people taking jetures of him and Dr. Raimondo?  Dr. Raimondo?  MR. KISLAR: The way the question was phrased, you asked him for his state of mind.  You seeked for what he might know or might not whow which is provided by Ohio Shield Law. The Chio Constitution protects than just sources of information, not — which there's a lot more that the Chio Constitution protects than just sources of information, which is protected by Ohio Shield Law.  MR. HOLMAN: Where are the exhibits, and the care the cashibits, an |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| were people taking pictures of you two?  MR, KESLAR: Objection. State of mind.  Editorial process. First Amendment privilege.  I instruct you not to arswer.  MR, HOLMAN: I don't understand. What's the state of or inind? I mis state for him to state whether or not a certain fact took place. Were the there people taking pictures of him and the proper to the people taking vome to a swing for him to state whether or not a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there people taking vome to a certain fact took place. Were the there of the took place whether or not a certain fact took place. Were the there of the took place whether or not a certain fact took place. Were the took place whether or not a certain fact took place. Were the took place whether or not a certain fact took place. Were the took place whether or not a certain fact took place. Were the took place whether or not a certain fact took place. Were the took place which in for his state of mind.  You asked for what he might know or might not a cartain fact took place. I deal to find the news articles.  MR, HOLMAN: Where are the exhibits, and the news articles. I deal to the took place are took which there's a lot more that 14:56:43 in the First Amendment and the Ohio Chorositudion protected then the news a tricles.  MR, HOLMAN: Where are the exhibits, and a first free fact to the first Amendment and the Ohio Chorositudion protected the first free fact of the first Amendment and the Ohio Chorositudion protected the first Amendment and the Ohio Chorositudion protected the first Amendment and the Ohio Chorositudion protecte |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| MR. KESLAR: Objection. State of mind.  13 Editorial processes. First Amendment privilege.  14 Instruct you not to answer.  15 MR, HOLMAN: I don't understand. What's 14:51:13 15 16 the editorial part of this and what's the state of mind? I'm just asking for him to state whether or not a certain fact took place. Were 19 there people taking pictures of him und 10. Dr. Raimondo?  10 Dr. Raimondo?  11 MR. KESLAR: The way the question was 12 phrased, you asked firm for his state of mind. 12 you saked for what he might know or might not 22 particles. Molnar Reporting Services, LLC (440) 340-6161  12 MR. HOLMAN: Where are the exhibits, 14:51:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                | <del>- 1,</del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Editorial process. First Amendment privilege.  14 Instruct you not to answer.  15 MR, HOLMAN: I don't understand, What's 14:51:13 the editorial part of this and what's the state of of mid? Thip just sating for him to state whether or not a certain fact took place. Were there people taking pictures of him and process. Process of the man decent of the process of him and process. Process of him and process of him and process. Process of him and process of him and process. Process of him and process of him and process. Process of him and process of him and process. Process of him and process of him and process. Process of him and process of him and process. Process of him and process of him a |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| tinstruct you not to arswer.  MR, HOLMAN: Understand. What's 14:51:13 15 16 the editorial part of this and what's the state of mind? I'm just asking for him to state whether or not a certain fact took place. Were 19 there people taking pictures of him and 14:51:30 17 there people taking pictures of him and 14:51:30 18 there people taking pictures of him and 14:51:30 18 there people taking pictures of him and 14:51:30 19 The Ohio Shield Law concern the First Amendment privilege, which is much broader than the Ohio Shield Law. The Ohio Shield Law concerns sources of information, not - which there's a lit more that 14:56:33 the First Amendment and the Ohio Constitution protects than just sources of information, which is protected by Ohio Shield Law. So to the extent that you're arguing that through this e-mail, that through the e-mail and communication that the present of the private.  10 MR. HOLMAN: Would you read back my question, please.  11 (Record read.)  12 MR. HOLMAN: Would you read back |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| MR, HOLMAN: I don't understand. What's the editorial part of this and what's the state the delitorial part of this and what's the state whether or not a certain fact took place. Were whether or not a certain fact took place. Were the people taking potures of him and Dr. Raimondo?  Dr. Raimondo?  MR, KFSLAR: The way the question was phrased, you asked him for his state of mind. You asked for what he might know or might not know. None of that was published in the news articles. Molrar Reporting Services, LLC (440) 340-6161  Page 167  MR, HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: The sorry. Can we take a brief break? My computer just froze. MR, HOLMAN: No apology. No, of course. MR, HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. Obscussion off record.)  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:29  MR, HOLMAN: Would you read back my question, please. 14:53:49  MR, HOLMAN: Would you read back my question, please. 14:53:49  MR, HOLMAN: Wou |                                                                                                                                | •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| the editorial part of this and what's the state of mind? Thi just asking for him to state whether or not a certain fact took place. Were there people taking pictures of him and Dr. Raimondo? 14:51:30 20 Dr. Raimondo? 14:51:30 21 MR. KESLAR: The way the question was phrased, you asked him for his state of mind. 22 phrased, you asked fin most here might have or might not 23 You asked for what he might have not might not 24 know. None of that was published in the news articles. 14:51:40 Molnar Reporting Services, LLC (440) 340-6161 22 the First Amendment and the Ohio Constitution protects than just sources of information, which is state to finind. 22 protects that just sources of information, which is a significant or might not 24 know. None of that was published in the news articles. 14:51:40 Molnar Reporting Services, LLC (440) 340-6161 24 minor protects than just sources of information, which is a significant or might have learned from the Chio Shield Law. So to the extent that you'ne arguing that through this e-mail, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 24 minor protects than just sources of information, which is size to the Erist Amendment and the Ohio Constitution protects than just sources of information, which is size tested by Ohio Shield Law. So to the extent that you'ne arguing that through this e-mail, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 24 minor protects than just sources of information, which is size that through this e-mail, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 25 minor material, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 25 minor material, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 25 minor material, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 25 minor material, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161 25 minor material, that I'm s |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| of mind? Tri just asking for him to state whether or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Were the their or not a certain fact took place. Which is much broader than the Ohio Shield Law. The |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                | 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| whether or not a certain fact took place. Were there people laking pictures of him and Dr. Raimondo? 14:51:30 Dr. Raimondo? 14:51:30 121 MR. KESLAR: The way the question was phrased, you asked him for his state of mind. 22 phrased, you asked for what he might know or might not know. None of that was published in the news articles. 14:51:40 25 articles. 14:51:40 26 MR. HOLMAN: Where are the exhibits, 2 Exhibits 1 and 2? Here's 2. Okay. Thank you. 3 THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. 5 MR. HOLMAN: No apology. No, of course. 5 MR. HOLMAN: No apology. No, of course. 6 VIDEOGRAPHER: On the record, 2:52. 7 (Discussion off record.) 9 MR. HOLMAN: Would you read back my question, please. 14:53:29 10 (Record read.) 10 (Record read.) 11 (Record read.) 12 (Record read.) 12 (Record read.) 13 MR. HOLMAN: Would you read back my question, please. 14:53:29 11 (Record read.) 12 (Record read.) 13 MR. HOLMAN: Would you read back my question, please. 14:53:29 11 (Record read.) 15 (Record read.) 16 e-mail is attached to Exhibit 1, and again, this is e-mail from you to Mr. Snyder dated Monday, April 16, 2018. The 14:55:20 alleged shopliffing incident and public demonstrations are subject to deposition question about whether people were 14:55:40 25 do (O. Neay. As you were at the event that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14:58:83 25 do (O. Neay. As you were at the court that 14 |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 19 there people taking pictures of him and 20 Dr. Raimondo? 21 MR. KESLAR: The way the question was phrased, you asked him for his state of mind. 22 know. None of that was published in the news articles. 23 I wasked for what he might know or might not know. None of that was published in the news articles. 24 know. None of that was published in the news articles. 25 I defended in the news articles. 26 MR. HOLMAN: Where are the exhibits, 2 Exhibits 1 and 2? Here's 2. Okay. Thank you. 27 THE REPORTER: I'm sorry. Can we take a 2 brief break? My computer just froze. 28 MR. HOLMAN: No apology. No, of course. 29 MR. HOLMAN: Would you read back my question, please. 29 MR. HOLMAN: Would you read back my question, please. 20 MR. HOLMAN: Would you read back my question, please. 21 think the objection is respectfully misplaced. 22 I think your question did not ask for what Mr. Hawk's personal observations related to the alleged shopliffing incident and public demonstrations are subject to deposition questioning." 20 Mr. Hawk's personal observations related to the alleged shopliffing incident and public demonstrations are subject to deposition apout whether people were 14:55:40 25 down were at the event that wish is presented and the proper assertion about whether people were 14:55:40 25 down were at the event that powers a lot more which there's a lot more that the first Amendment and the Ohio Constitution protects than just sources of information, which is protected by Ohio Shield Law concerns sources of information, which is protected by Ohio Shield Law concerns a lot must be a lot more that the Shie Constitution protects than just sources of information, which is protected by Ohio Shield Law concerns a lot more that the Shie Law concerns a lit. 14:56:43 is protected by Ohio Shield Law concerns a lot must be a lot more that the Shie Constitution protects that you are first amending that here's a lot more than the Shie Law concerns for information, which is protected by Ohio Shield Law concerns for information, which is p |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Dr. Raimordo?  MR. KESLAR: The way the question was particles. It is state of mind.  Nous asked for what he might know or might not know. None of that was published in the news articles. It is 14:51:40  Molnar Reporting Services, LLC (440) 340-6161  MR. HOLMAN: Where are the exhibits, and 2? Here's 2. Okay. Thank you.  THE REPORTER: In sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  VIDEOGRAPHER: Off the record, 2:52.  MR. HOLMAN: Would you read back my question, please. It is 329  (Record read.)  MR. HOLMAN: Okay. For the record here, It is think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of holfs Shield Law.  20 information, not — which there's a lot more that 14:56:33 the First Amendment and the Olio Constitution protects than just sources of information, which is protected by Ohio Shield Law.  So to the extent that you're arguing that through this e-mail, that I'm somehow making 14:56:46 Molnar Reporting Services, LLC (440) 340-6161  Page 167  Page 167  Page 169  Page 169  Page 169  An improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw saw, but rather what he knows. And so I would draw a down and the proposed to what Mr. Hawk saw so I would draw saw, but rather what he knows. And so I would draw saw to the knows and the prop |                                                                                                                                | <u>-</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| MR. KESLAR: The way the question was phrased, you asked him for his state of mind.  You asked firm for his state of mind.  You asked firm for his state of mind.  You asked for what he might know or might not articles.  14:51:40  Molear Reporting Services, LLC (440) 340-6161  Page 167  MR. HOLMAN: Where are the exhibits.  Exhibits 1 and 2? Here's 2. Okay. Thank you.  THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  WIDEOGRAPHER: Off the record, 2:52.  MR. HOLMAN: Would you read back my question, please.  WIDEOGRAPHER: Off the record deck my question, please.  (Record read.)  MR. HOLMAN: Would you read back my question, please.  (Record read.)  MR. HOLMAN: Okay. For the record here, the mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of the Cexhibit and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your application of the cord here, and the first proper sore pelle taking you pricture?  Mr. Hawk's personal observations related to the alleged shopliffing incident and public decomposition question about whether people were 14:55:40  He First Amendment and the Ohio Christitian is the middle by othe winch is protected by Ohio Shield Law.  So to the extent that you're arguing that through this e-mail, that firs onehow making 14:56:46  Molnar Reporting Services, LLC (440) 340-6161  Page 169  Page 169  Page 169  An improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information there because it also I would draw a distinction there because it what Mr. Hawk's saw, but rather what he knows. And so I would draw a distinction there were asset in the what he knows. And so I would draw a distinction there because it what Mr. Hawk's saw, but rather what he k |                                                                                                                                | • • = :                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 20                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| phrased, you asked fim for his state of mind. You asked for what he might know or might not know. Nore of that was published in the news articles.  Molnar Reporting Services, LLC (440) 340-6161  Page 167  MR. HOLMAN: Where are the exhibits, Exhibits I and 2? Here's 2. Okay. Thank you.  THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. MR. HOLMAN: No apology. No, of course. MR. HOLMAN: Okay. For the record, 2:52. MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misphaced. MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misphaced. Mr. Snyder dated Monday, April 16, 2018. The ce-mail is attached to Exhibit I, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that with us his protected by Ohio Shield Law, in that there are no issues essentially with us asking questioning."  22 protects than just sources of information, which is protected by Ohio Shield Law. So to the extent that you're arguing that through this e-mail, that I'm somehow making Molnar Reporting Services, LLC (440) 340-6161  Page 169  Pag |                                                                                                                                | The state of the s | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| You asked for what he might know or might not know. None of that was published in the news articles. 14-51.40 Molnar Reporting Services, LLC (440) 340-6161  Page 167  MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. 2 disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And brief break? My computer just froze. 4 brief break? My computer just froze. 5 MR. HOLMAN: No apology. No, of course. 5 MR. HOLMAN: No apology. No, of course. 5 VIDEOGRAPHER: Off the record, 2:52. 6 VIDEOGRAPHER: On the record, 2:52. 7 (Discussion off record.) 7 (Discussion off record.) 8 VIDEOGRAPHER: On the record, 2:52. 8 MR. HOLMAN: Would you read back my question, please. 14:53:29 10 (Record read.) 10 MR. HOLMAN: Okay. For the record here, 12 MR. HOLMAN: Okay. For the record here, 13 I think the objection is respectfully misplaced. 1 I want to read an e-mail, Mr. Keslar, from you to 15 Mr. Snyder and Mr. Molnar Reporting Services, LLC (440) 340-6161  Page 169  Page 167  Page 169  Page 1 |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 22                                                                                                                             | protects than just sources of information, which                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 24 know. None of that was published in the news articles.  Molnar Reporting Services, LLC (440) 340-6161  Page 167  Page 167  MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you.  THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  MR. HOLMAN: No apology. No, of course.  MR. HOLMAN: No apology. No, of course.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you read back my question please.  MR. HOLMAN: Would you be e-mail and communications that you and Mr. Snyder all 4:57:14  and communications that you and Mr. Snyder all 4:57:14  and the proper assertion of the privilege. And here, you know, again, you state werbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations related to the lat:55:20  MR. HOLMAN: Woll respectfully misplaced.  MR. HOLMAN: Woll, you know, I think there were no issues essentially  |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 23                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| articles. 14:51:40 Molnar Reporting Services, LLC (440) 340-6161  Page 167  Page 169  MR. HOLMAN: Where are the exhibits, 2 Exhibits 1 and 2? Here's 2. Okay. Thank you. 3 THE REPORTER: I'm sorry. Can we take a 4 brief break? My computer just froze. 4 brief break? My computer just froze. 5 MR. HOLMAN: No apology. No, of course. 5 MR. HOLMAN: No apology. No, of course. 6 VIDEOGRAPHER: Off the record, 2:52. 8 MR. HOLMAN: Would you read back my 9 to VIDEOGRAPHER: On the record, 2:52. 8 MR. HOLMAN: Would you read back my 10 question, please. 14:53:29 11 (Record read.) 11 (Record read.) 11 (Record read.) 11 (Record read.) 12 MR. HOLMAN: Okay. For the record here, 13 I think the objection is respectfully misplaced. 15 Mr. Snyder dated Monday, April 16, 2018. The 14:54:53 16 e-mail is attached to Exhibit 1, and again, this 16 is an e-mail from you to Mr. Snyder, and it says, 18 quote, "I generally do not disagree with your 19 understanding of Ohio's Shield Law, in that 20 Mr. Hawk's personal observations related to the 14:55:20 alleged shoplifting incident and public demonstrations are subject to deposition 23 questioning." 25 think the question about whether people were 14:55:40 25 Molnar Reporting Services, LLC (440) 340-6161  Page 169  An improper objection, I would respectfully disagree. I think your question did not ask for what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally same and promother mail, Mr. East and the proper to rely upon the e-mail and communications that you and Mr. Snyder and communications that you and Mr. Snyder and communications that you and Mr. Snyder and the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking questions and that's all Tm asking is for him to share with us his personal observations. So I'll recreated to the All the privilege of the examination and the proper assertion of  | 24                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 24                                                                                                                             | So to the extent that you're arguing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Page 167  MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course. Tight for the record, 2:52. MR. HOLMAN: No apology. No, of course. WIDEOGRAPHER: Off the record, 2:52. MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Would you read back my question, please.  MR. HOLMAN: Okay. For the record here, I want to read an e-mail, Mr. Keslar, from you to MR. HOLMAN: Okay. For the record here, I want to read an e-mail, Mr. Keslar, from you to MR. Snyder dated Monday, April 16, 2018. The Mr. Snyder dated Monday, April 16, 2018. The Mr. Snyder dated Monday, April 16, 2018. The Mr. Hawk's personal observations related to the MR. Holman: Mr. Hawk's personal observations related to the MR. Holman: Mr. Hawk's personal observations related to the MR. Holman: Mr. Hawk's personal observations are subject to deposition questioning."  Page 169  an improper objection, I would respectfully disagree. 1 think your question did not ask for what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks aw, but rather what he knows. And what Mr. Hawks was the flaw says, I think the question about whether people were  14.55:40  Page 169  an improper objection, I would respectfully disagree. 1 think your question did not ask for what Mr. Hawks way, but rather what he knows. And what Mr. Hawks way, I think the question about whether people were  14.57:49  Q. Okay. As you were at the event that  14.58:03                                                   | 25                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 25                                                                                                                             | <u> </u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1 MR. HOLMAN: Where are the exhibits, 2 Exhibits 1 and 2? Here's 2. Okay. Thank you. 3 THE REPORTER: I'm sorry. Can we take a 4 brief break? My computer just froze. 5 MR. HOLMAN: No apology. No, of course. 6 VIDEOGRAPHER: Off the record, 2:52. 7 (Discussion off record.) 8 VIDEOGRAPHER: On the record, 2:52. 9 MR. HOLMAN: Would you read back my 10 question, please. 14:53:29 11 think the objection is respectfully misplaced. 12 MR. HOLMAN: Okay. For the record here, 13 I think the objection is respectfully misplaced. 14 I want to read an e-mail, Mr. Keslar, from you to 15 Mr. Snyder dated Monday, April 16, 2018. The 16 e-mail is attached to Exhibit 1, and again, this 17 is an e-mail from you to Mr. Sryder, and it says, 18 quote, "I generally do not disagree with your 19 understanding of Ohio's Shield Law, in that 19 understanding of Ohio's Shield Law, in that 20 Mr. Hawk's personal observations related to the 21 alleged shoplifting incident and public demonstrations are subject to deposition 22 questioning." 23 Q. When you were talking to Dr. Raimondo, did you were the event that 24 So setting aside what the law says, I 25 think the question about whether people were  14:55:40  1 an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely prope to rely upon the e-mail and communications that you and Mr. Snyder 14:57:14 exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal obser |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Exhibits I and 2? Here's 2. Okay. Thank you.  THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  VIDEOGRAPHER: Off the record, 2:52.  (Discussion off record.)  NR. HOLMAN: Would you read back my question, please.  (Record read.)  MR. HOLMAN: Okay. For the record here, 12 chart the objection is respectfully misplaced.  I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit I, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that wind the first personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition question about whether people were 14:55:40  Exhibits I and 2? Here's 2. Okay. To make a brief break? My computer just froze.  3 disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder 14:57:14 exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking quost, "I generally do not disagree with your with us his personal observations. So I'll restate the question. 14:57:49  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that 14:58:03                                                                          |                                                                                                                                | Page 167                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | +                                                                                                                              | D 160                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Exhibits I and 2? Here's 2. Okay. Thank you.  THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  VIDEOGRAPHER: Off the record, 2:52.  (Discussion off record.)  NR. HOLMAN: Would you read back my question, please.  (Record read.)  MR. HOLMAN: Okay. For the record here, 12 chart the objection is respectfully misplaced.  I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit I, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that wind the first personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition question about whether people were 14:55:40  Exhibits I and 2? Here's 2. Okay. To make a brief break? My computer just froze.  3 disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder 14:57:14 exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking quost, "I generally do not disagree with your with us his personal observations. So I'll restate the question. 14:57:49  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that 14:58:03                                                                          |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              | Page 169                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  VIDEOGRAPHER: Off the record, 2:52.  MR. HOLMAN: Would you read back my Question, please.  I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition question, about whether people were are no issues essentially seven that what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally assume.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking questions about Mr. Hawk's personal observations. So I'll restate the question.  Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning."  So setting aside what the law says, I think the question about whether people were 14:55:40  A I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                               | 7                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| brief break? My computer just froze.  MR. HOLMAN: No apology. No, of course.  VIDEOGRAPHER: Off the record, 2:52.  MR. HOLMAN: Would you read back my  Question, please.  Ithink the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to  Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that  Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition question about whether people were  vibration is an e-mail said what the law says, I think the question about whether people were  vibration  so I would draw a distinction there because it calls for information he might have learned from 14:57:02  somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all 'm asking is for him to share with us his personal observations. So I'll restate the question.  14:57:49  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that  14:58:03                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                | MR. HOLMAN: Where are the exhibits,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                | an improper objection, I would respectfully                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| MR. HOLMAN: No apology. No, of course.  VIDEOGRAPHER: Off the record, 2:52.  (Discussion off record.)  VIDEOGRAPHER: On the record, 2:52.  MR. HOLMAN: Well, you know, I think  MR. HOLMAN: Would you read back my question, please.  (Record read.)  MR. HOLMAN: Okay. For the record here,  I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to  Mr. Snyder dated Monday, April 16, 2018. The c-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that  Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition question about whether people were  14:55:40  Calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder to reckanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper socpe of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.  14:57:49 Q. When you were talking to Dr. Raimondo, di you observe people taking your picture? A. I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that  14:58:03                                                                                                                                                                                                                                                                                                                                                                                          | 2                                                                                                                              | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2                                                                                                                              | an improper objection, I would respectfully disagree. I think your question did not ask for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| VIDEOGRAPHER: Off the record, 2:52.  (Discussion off record.)  VIDEOGRAPHER: On the record, 2:52.  MR. HOLMAN: Would you read back my question, please.  14:53:29  MR. HOLMAN: Would you read back my question, please.  14:53:29  MR. HOLMAN: Would you read back my question, please.  14:53:29  MR. HOLMAN: Would you and Mr. Snyder 14:57:14  And communications that you and Mr. Snyder 14:57:14  Exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31  Exemple 19  Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that understanding of Ohio's Shield Law, in that alleged shoplifting incident and public demonstrations are subject to deposition questioning."  Mr. Hawk's personal observations related to the alleged shoplifting incident and public questioning."  So setting aside what the law says, I think the question about whether people were 14:55:40  Mr. Hawk's personal observations are subject to deposition questioning."  A. I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3                                                                                                                         | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2                                                                                                                              | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| VIDEOGRAPHER: On the record, 2:52.  MR. HOLMAN: Would you read back my question, please.  14:53:29  (Record read.)  MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the understanding and public demonstrations are subject to deposition questioning."  8 MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder 14:55:40  10 and communications that you and Mr. Snyder 14:57:14  11 exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that I there are no issues essentially with us asking quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that 19 with us his personal observations. So I'll restate the question. 14:57:49  20 When you were talking to Dr. Raimondo, did you observe people taking your picture? 21 Q. When you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4                                                                                                                    | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4                                                                                                                    | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 9 MR. HOLMAN: Would you read back my 10 question, please. 14:53:29 11 (Record read.) 12 MR. HOLMAN: Okay. For the record here, 13 I think the objection is respectfully misplaced. 14 I want to read an e-mail, Mr. Keslar, from you to 15 Mr. Snyder dated Monday, April 16, 2018. The 16 e-mail is attached to Exhibit 1, and again, this 17 is an e-mail from you to Mr. Snyder, and it says, 18 quote, "I generally do not disagree with your 19 understanding of Ohio's Shield Law, in that 10 and communications that you and Mr. Snyder 11 exchanged, because obviously, the point of you 12 two talking was to come to some understanding on 13 the scope, the proper scope of the examination 14 and the proper assertion of the privilege. And 15 here, you know, again, you state verbatim that 14:57:31 16 there are no issues essentially with us asking 17 questions about Mr. Hawk's personal observations, 18 and that's all I'm asking is for him to share 19 understanding of Ohio's Shield Law, in that 20 Mr. Hawk's personal observations related to the 21 alleged shoplifting incident and public 22 demonstrations are subject to deposition 23 questioning." 24 So setting aside what the law says, I 25 think the question about whether people were 14:55:40 29 that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder 20 exchanged, because obviously, the point of you 21 two talking was to come to some understanding on 22 the scope, the proper scope of the examination 24 and the proper assertion of the privilege. And 29 the scope, the proper scope of the examination 21 and communications that you and Mr. Snyder 22 two talking was to come to some understanding on 23 the scope, the proper scope of the examination 24 and the proper assertion of the privilege. And 25 the proper assertion of the privilege. 29 And 20 When you state verbatim that 21:57:31 21 think the question about whether people were 22 did you observe people taking your picture? 23 A. I don't recall seeing anyone take my 24 picture. 25 Q. Okay. As you w | 2<br>3<br>4<br>5                                                                                                               | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5                                                                                                               | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| question, please. 14:53:29  10 and communications that you and Mr. Snyder 14:57:14  11 (Record read.)  12 MR. HOLMAN: Okay. For the record here, 12 two talking was to come to some understanding on 15 think the objection is respectfully misplaced. 13 the scope, the proper scope of the examination 14 and the proper assertion of the privilege. And 15 Mr. Snyder dated Monday, April 16, 2018. The 14:54:53 15 here, you know, again, you state verbatim that 14:57:31 16 e-mail is attached to Exhibit 1, and again, this 16 is an e-mail from you to Mr. Snyder, and it says, 18 quote, "I generally do not disagree with your 19 understanding of Ohio's Shield Law, in that 19 understanding of Ohio's Shield Law, in that 19 with us his personal observations. So Pil 19 alleged shoplifting incident and public 19 demonstrations are subject to deposition 19 questioning." 10 Q. When you were talking to Dr. Raimondo, 19 did you observe people taking your picture? 19 A. I don't recall seeing anyone take my 19 picture. 19 picture. 19 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6                                                                                                          | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6                                                                                                          | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| (Record read.)  MR. HOLMAN: Okay. For the record here,  I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to  Mr. Snyder dated Monday, April 16, 2018. The  e-mail is attached to Exhibit 1, and again, this  is an e-mail from you to Mr. Snyder, and it says,  quote, "I generally do not disagree with your  understanding of Ohio's Shield Law, in that  Mr. Hawk's personal observations related to the  alleged shoplifting incident and public  demonstrations are subject to deposition  questioning."  11 exchanged, because obviously, the point of you  two talking was to come to some understanding on  the scope, the proper scope of the examination  14 and the proper assertion of the privilege. And  here, you know, again, you state verbatim that  14:57:31  there are no issues essentially with us asking  questions about Mr. Hawk's personal observations,  and that's all I'm asking is for him to share  with us his personal observations. So PII  restate the question.  14:57:49  Q. When you were talking to Dr. Raimondo,  did you observe people taking your picture?  A. I don't recall seeing anyone take my  picture.  Q. Okay. As you were at the event that  14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| MR. HOLMAN: Okay. For the record here,  I think the objection is respectfully misplaced.  I want to read an e-mail, Mr. Keslar, from you to  Mr. Snyder dated Monday, April 16, 2018. The  e-mail is attached to Exhibit 1, and again, this  resmall from you to Mr. Snyder, and it says,  quote, "I generally do not disagree with your  understanding of Ohio's Shield Law, in that  Mr. Hawk's personal observations related to the  Mr. Hawk's personal observations related to the  alleged shoplifting incident and public  demonstrations are subject to deposition  questioning."  So setting aside what the law says, I  think the question about whether people were  12 two talking was to come to some understanding on  the scope, the proper scope of the examination  and the proper assertion of the privilege. And  here, you know, again, you state verbatim that  14:57:31  there are no issues essentially with us asking  questions about Mr. Hawk's personal observations,  and that's all I'm asking is for him to share  with us his personal observations. So PII  restate the question.  Q. When you were talking to Dr. Raimondo,  did you observe people taking your picture?  A. I don't recall seeing anyone take my  picture.  Q. Okay. As you were at the event that  14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 13 I think the objection is respectfully misplaced.  14 I want to read an e-mail, Mr. Keslar, from you to 15 Mr. Snyder dated Monday, April 16, 2018. The 16 e-mail is attached to Exhibit 1, and again, this 17 is an e-mail from you to Mr. Snyder, and it says, 18 quote, "I generally do not disagree with your 19 understanding of Ohio's Shield Law, in that 20 Mr. Hawk's personal observations related to the 21 alleged shoplifting incident and public 22 demonstrations are subject to deposition 23 questioning." 24 So setting aside what the law says, I 25 think the question about whether people were 13 the scope, the proper scope of the examination 14 and the proper assertion of the privilege. And 14 here, you know, again, you state verbatim that 14:57:31 16 there are no issues essentially with us asking 17 questions about Mr. Hawk's personal observations, 18 and that's all I'm asking is for him to share 19 with us his personal observations. So I'll 19 restate the question. 14:57:49 20 Q. When you were talking to Dr. Raimondo, 21 did you observe people taking your picture? 23 A. I don't recall seeing anyone take my 24 picture. 25 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from 14:57:02 somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder 14:57:14                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| I want to read an e-mail, Mr. Keslar, from you to  Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning."  No setting aside what the law says, I think the question about whether people were  14 and the proper assertion of the privilege. And here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So Pil restate the question. 14:57:49 Q. When you were talking to Dr. Raimondo, did you observe people taking your picture? A. I don't recall seeing anyone take my picture.  Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning."  No setting aside what the law says, I think the question about whether people were  14:55:40  15 here, you know, again, you state verbatim that 14:57:31 there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So Pil restate the question. 14:57:49 Q. When you were talking to Dr. Raimondo, did you observe people taking your picture? A. I don't recall seeing anyone take my picture.  Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that munderstanding of Ohio's Shield Law, in that munderstandi | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please.  (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that munderstanding o | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. 14:53:29 (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And                                                                                                                                                                                                                                                                                                                                                                                                         |
| quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that understanding of Ohio's Shield Law, in that with us his personal observations. So Pil with us his personal observations. So Pil restate the question. 14:57:49  alleged shoplifting incident and public demonstrations are subject to deposition questioning." Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture.  So setting aside what the law says, I think the question about whether people were 14:55:40 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. 14:53:29 (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that  14:57:31                                                                                                                                                                                                                                                                                                                                                |
| understanding of Ohio's Shield Law, in that  mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning."  So setting aside what the law says, I think the question about whether people were  understanding of Ohio's Shield Law, in that  powith us his personal observations. So PII  prestate the question.  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture.  Q. When you were at the event that  14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. 14:53:29 (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking                                                                                                                                                                                                                                                                                                           |
| Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning."  So setting aside what the law says, I think the question about whether people were  14:55:20 20 restate the question. 14:57:49 21 Q. When you were talking to Dr. Raimondo, 22 did you observe people taking your picture? 23 A. I don't recall seeing anyone take my 24 picture. 25 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. 14:53:29 (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations,                                                                                                                                                                                                                                                         |
| 21 alleged shoplifting incident and public 22 demonstrations are subject to deposition 23 questioning." 24 So setting aside what the law says, I 25 think the question about whether people were 26 V. When you were talking to Dr. Raimondo, 27 did you observe people taking your picture? 28 A. I don't recall seeing anyone take my 29 picture. 29 Q. Okay. As you were at the event that 20 Okay. As you were at the event that 21 Q. When you were talking to Dr. Raimondo, 22 did you observe people taking your picture? 23 A. I don't recall seeing anyone take my 24 picture. 25 Q. Okay. As you were at the event that 26 Okay. As you were at the event that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share                                                                                                                                                                                                           |
| demonstrations are subject to deposition  2 did you observe people taking your picture?  2 did you observe people taking your picture?  2 A. I don't recall seeing anyone take my  2 picture.  2 think the question about whether people were 14:55:40 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll                                                                                                                                                                |
| questioning."  23 A. I don't recall seeing anyone take my 24 So setting aside what the law says, I 25 think the question about whether people were 14:55:40 26 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.                                                                                                                                          |
| So setting aside what the law says, I  24 picture.  25 think the question about whether people were 14:55:40 25 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the alleged shoplifting incident and public                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.  Q. When you were talking to Dr. Raimondo,                                                                                               |
| 25 think the question about whether people were 14:55:40 25 Q. Okay. As you were at the event that 14:58:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my          |
| Molnar Reporting Services, U.C. 1440) 340-0101 1 Wighlar Reporting Services, ELC (440) 340-0101                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. 14:53:29 (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning." So setting aside what the law says, I                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture. |
| TAXIIIII Toporting Derricos, 2220 (110) 3 to 0101                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | MR. HOLMAN: Where are the exhibits, Exhibits 1 and 2? Here's 2. Okay. Thank you. THE REPORTER: I'm sorry. Can we take a brief break? My computer just froze. MR. HOLMAN: No apology. No, of course. VIDEOGRAPHER: Off the record, 2:52. (Discussion off record.) VIDEOGRAPHER: On the record, 2:52. MR. HOLMAN: Would you read back my question, please. 14:53:29 (Record read.) MR. HOLMAN: Okay. For the record here, I think the objection is respectfully misplaced. I want to read an e-mail, Mr. Keslar, from you to Mr. Snyder dated Monday, April 16, 2018. The e-mail is attached to Exhibit 1, and again, this is an e-mail from you to Mr. Snyder, and it says, quote, "I generally do not disagree with your understanding of Ohio's Shield Law, in that Mr. Hawk's personal observations related to the alleged shoplifting incident and public demonstrations are subject to deposition questioning." So setting aside what the law says, I                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | an improper objection, I would respectfully disagree. I think your question did not ask for what Mr. Hawk saw, but rather what he knows. And so I would draw a distinction there because it calls for information he might have learned from somebody else as opposed to what he personally saw.  MR. HOLMAN: Well, you know, I think that it's entirely proper to rely upon the e-mail and communications that you and Mr. Snyder exchanged, because obviously, the point of you two talking was to come to some understanding on the scope, the proper scope of the examination and the proper assertion of the privilege. And here, you know, again, you state verbatim that there are no issues essentially with us asking questions about Mr. Hawk's personal observations, and that's all I'm asking is for him to share with us his personal observations. So I'll restate the question.  Q. When you were talking to Dr. Raimondo, did you observe people taking your picture?  A. I don't recall seeing anyone take my picture. |

|                                                                                                                      | Page 170                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                      | Page 172                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                    | entire day, did you observe people taking your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 1                                                                                                                    | hand you anything?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2                                                                                                                    | picture?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2                                                                                                                    | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3                                                                                                                    | A. I don't recall seeing anyone taking my                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 3                                                                                                                    | Q. Okay. What?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4                                                                                                                    | picture.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4                                                                                                                    | A. She handed me a flyer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5                                                                                                                    | Q. Okay. Did David Gibson take your 14:58:15                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                                    | Q. What kind of flyer? 15:00:50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6                                                                                                                    | picture that day?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6                                                                                                                    | A. A flyer that insinuated that Gibson's                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 7                                                                                                                    | <ol> <li>A. I have no way of knowing that.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 7                                                                                                                    | Bakery was a racist institution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 8                                                                                                                    | Q. Okay. What about Allyn D. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 8                                                                                                                    | Q. Do you recall any of the exact words                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 9                                                                                                                    | A. I also have no way of knowing that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9                                                                                                                    | that appeared on the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10                                                                                                                   | Q. What about Allyn W. Gibson? 14:58:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 10                                                                                                                   | A. Racist was one of them. 15:01:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11                                                                                                                   | A. I also have no way of knowing that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 11                                                                                                                   | Q. Are there any other words that you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12                                                                                                                   | Q. You took pictures that day, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 12                                                                                                                   | recall specifically seeing on the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 13                                                                                                                   | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 13<br>14                                                                                                             | A. I don't recall any specific passages of the flyer, no.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 14                                                                                                                   | Q. Okay. Did your colleague take pictures?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 15                                                                                                                   | Q. Can you describe the size of this flyer? 15:01:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 15                                                                                                                   | A. No. 14:58:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 16                                                                                                                   | A. I believe it was eight and a half by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 16                                                                                                                   | Q. Okay. What kind of camera do you shoot                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 17                                                                                                                   | eleven.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 17                                                                                                                   | with? A. Usually, it's a Nikon D70.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 18                                                                                                                   | Q. Was it a color or black-and-white flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 18<br>19                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 19                                                                                                                   | A. I don't recall off the top of my head.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 20                                                                                                                   | Q. Okay. What kind of lens do you carry?  A. General kit lenses and a zoom. 14:58:50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 20                                                                                                                   | Q. Did you ask Dr. Raimondo for the flyer? 15:01:54                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 21                                                                                                                   | Q. I'm sorry. General                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 21                                                                                                                   | MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 22                                                                                                                   | A. A 35 to 70 millimeter lens as well as a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 22                                                                                                                   | privilege on the same basis previous -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 23                                                                                                                   | zoom lens.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 23                                                                                                                   | previously stated. Reporter's privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 24                                                                                                                   | Q. Okay. What's the zoom capacity?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 24                                                                                                                   | You don't have to answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 25                                                                                                                   | A. I think it's 180. I'd have to look at 14:59:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 25                                                                                                                   | Q. Did you ask Dr. Raimondo about the 15:02:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                      | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                      | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1                                                                                                                    | Page 171 the lens.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                                                                                                                    | Page 173 student protest?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2                                                                                                                    | Q. Is that the - is that the end focal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2                                                                                                                    | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                      | length of the lens?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 3                                                                                                                    | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4                                                                                                                    | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 4                                                                                                                    | I'm going to instruct you not to answer.  Q. Did you ask Dr. Raimondo why the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4<br>5                                                                                                               | A. Yes.<br>Q. Okay. Is it a 70 to 180? 14:59:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 4<br>5                                                                                                               | Pm going to instruct you not to answer.  Q. Did you ask Dr. Raimondo why the students were protesting?  15:02:31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4<br>5<br>6                                                                                                          | A. Yes. Q. Okay. Is it a 70 to 180? 14:59:12 A. I believe so.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 4<br>5<br>6                                                                                                          | Pm going to instruct you not to answer.  Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4<br>5<br>6<br>7                                                                                                     | <ul> <li>A. Yes.</li> <li>Q. Okay. Is it a 70 to 180? 14:59:12</li> <li>A. I believe so.</li> <li>Q. What's the aperture of the 30 to 70 zoom</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 4<br>5<br>6<br>7                                                                                                     | Pm going to instruct you not to answer.  Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection.  Pm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4<br>5<br>6<br>7<br>8                                                                                                | A. Yes. Q. Okay. Is it a 70 to 180? 14:59:12 A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 4<br>5<br>6<br>7<br>8                                                                                                | Pm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection.  Pm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4<br>5<br>6<br>7<br>8<br>9                                                                                           | <ul> <li>A. Yes.</li> <li>Q. Okay. Is it a 70 to 180? 14:59:12</li> <li>A. I believe so.</li> <li>Q. What's the aperture of the 30 to 70 zoom that you use?</li> <li>A. It depends on what setting you're using.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 4<br>5<br>6<br>7<br>8<br>9                                                                                           | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 4<br>5<br>6<br>7<br>8<br>9                                                                                           | <ul> <li>A. Yes.</li> <li>Q. Okay. Is it a 70 to 180? 14:59:12</li> <li>A. I believe so.</li> <li>Q. What's the aperture of the 30 to 70 zoom that you use?</li> <li>A. It depends on what setting you're using.</li> <li>Q. Sure. What's the widest aperture? 14:59:23</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4<br>5<br>6<br>7<br>8<br>9                                                                                           | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection.  15:02:42                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | <ul> <li>A. Yes.</li> <li>Q. Okay. Is it a 70 to 180? 14:59:12</li> <li>A. I believe so.</li> <li>Q. What's the aperture of the 30 to 70 zoom that you use?</li> <li>A. It depends on what setting you're using.</li> <li>Q. Sure. What's the widest aperture? 14:59:23</li> <li>A. I honestly wouldn't look – or know</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                              | 4<br>5<br>6<br>7<br>8<br>9                                                                                           | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | <ul> <li>A. Yes.</li> <li>Q. Okay. Is it a 70 to 180? 14:59:12</li> <li>A. I believe so.</li> <li>Q. What's the aperture of the 30 to 70 zoom that you use?</li> <li>A. It depends on what setting you're using.</li> <li>Q. Sure. What's the widest aperture? 14:59:23</li> <li>A. I honestly wouldn't look — or know without looking at the specs.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                | 4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this                                                                                                                                                                                                                                                                                                                                                                               |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | <ul> <li>A. Yes.</li> <li>Q. Okay. Is it a 70 to 180? 14:59:12</li> <li>A. I believe so.</li> <li>Q. What's the aperture of the 30 to 70 zoom that you use?</li> <li>A. It depends on what setting you're using.</li> <li>Q. Sure. What's the widest aperture? 14:59:23</li> <li>A. I honestly wouldn't look — or know without looking at the specs.</li> <li>Q. Okay. What's the widest aperture of the</li> </ul>                                                                                                                                                                                                                                                                                                            | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180?                                                                                                                                                                                                                                                                                                                                                                             | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?                                                                                                                                                                                                                                                                                                                                                                        |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. 14:59:37                                                                                                                                                                                                                                                                                                                                             | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for                                                                                                                                                                                                                                                                                                                                      |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180?                                                                                                                                                                                                                                                                                                                                                                             | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | I'm going to instruct you not to answer.  Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection.  I'm going to instruct you not to answer.  Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection.  I'm going to instruct you not to answer.  Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's                                                                                                                                                                             |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. Q. Okay. So before the break, we were                                                                                                                                                                                                                                                                                                                | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries                                                                                                                                                                                                                                  |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to                                                                                                                                                                                                      | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer.                                                                                                                           |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. A. For — I don't know. Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to Dr. Raimondo, did you ask her any questions? 15:00:20                                                                                                                         | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer. Q. Did Dr. Raimondo pull this flyer out of 15:03:21                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to                                                                                                                                                                                                      | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer.  Q. Did Dr. Raimondo pull this flyer out of 15:03:21 her pocket?                                                          |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. A. For — I don't know. Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to Dr. Raimondo, did you ask her any questions? MR. KESLAR: Objection. First Amendment privilege.                                                                                | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer. Q. Did Dr. Raimondo pull this flyer out of 15:03:21 her pocket? A. No.                                                    |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. A. For — I don't know. 14:59:37 Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to Dr. Raimondo, did you ask her any questions? MR. KESLAR: Objection. First Amendment privilege. I'm going to instruct you not to answer                               | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer. Q. Did Dr. Raimondo pull this flyer out of 15:03:21 her pocket? A. No. Q. Where was it?                                   |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. A. For — I don't know. 14:59:37 Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to Dr. Raimondo, did you ask her any questions? MR. KESLAR: Objection. First Amendment privilege. I'm going to instruct you not to answer that. And asked and answered. | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer. Q. Did Dr. Raimondo pull this flyer out of 15:03:21 her pocket?  A. No. Q. Where was it?  MR. KESLAR: Again, I'm going to |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. Yes. Q. Okay. Is it a 70 to 180? A. I believe so. Q. What's the aperture of the 30 to 70 zoom that you use? A. It depends on what setting you're using. Q. Sure. What's the widest aperture? A. I honestly wouldn't look — or know without looking at the specs. Q. Okay. What's the widest aperture of the zoom that has a capacity up to 180? A. For — I don't know. A. For — I don't know. 14:59:37 Q. Okay. So before the break, we were talking about your contact with Dr. Raimondo. Strike that, please. All right. So when you were talking to Dr. Raimondo, did you ask her any questions? MR. KESLAR: Objection. First Amendment privilege. I'm going to instruct you not to answer                               | 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo why the students were protesting?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. Did you ask Dr. Raimondo about the purpose of the student protests?  MR. KESLAR: Same objection. I'm going to instruct you not to answer. Q. From where did Dr. Raimondo get this flyer?  MR. KESLAR: Objection. Calls for information gathered during the reporting process not including in his news articles, so it carries with it a First Amendment privilege, reporter's privilege, so I'm going to instruct you not to answer. Q. Did Dr. Raimondo pull this flyer out of 15:03:21 her pocket? A. No. Q. Where was it?                                   |

|                                                                                                                | Page 174                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                           | Page 176                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                              | reporter's privilege as I've previously stated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                         | how close or far away was she from you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2                                                                                                              | Q. So if Dr. Raimondo did not pull it out                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2                                                                                                                         | <ul> <li>A. I have no way of accurately measuring</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3                                                                                                              | of her pocket, where was it immediately before                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 3                                                                                                                         | that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 4                                                                                                              | she handed it to you?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 4                                                                                                                         | <ul> <li>Q. Okay. Can you estimate for me the</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5                                                                                                              | MR. KESLAR: On the same basis of 15:03:53                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 5                                                                                                                         | distance that she stood from you when she handed 15:06:06                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6                                                                                                              | privilege, I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 6                                                                                                                         | you this flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 7                                                                                                              | answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7                                                                                                                         | A. A couple of feet.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8                                                                                                              | Q. Did Dr. Raimondo have more than one copy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 8                                                                                                                         | Q. A couple of feet. When she was standing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9                                                                                                              | of this flyer on her?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9                                                                                                                         | a few feet away from you, did you feel that she                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10                                                                                                             | A. Not to my knowledge. 15:04:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 10                                                                                                                        | was invading your personal space? 15:06:17                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11                                                                                                             | Q. Okay. Did Dr. Raimondo tell you that an                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 11                                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 12                                                                                                             | Oberlin student had given her the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 12                                                                                                                        | <ul> <li>Q. Are you aware of people taking pictures</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 13                                                                                                             | MR. KESLAR: Objection, First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 13                                                                                                                        | when Dr. Raimondo handed you the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 14                                                                                                             | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 14                                                                                                                        | MR, KESLAR: Same objection that I made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 15                                                                                                             | I'm going to instruct you not to answer. 15:04:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 15                                                                                                                        | previously, because it calls for information he 15:06:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 16                                                                                                             | Q. Did Dr. Raimondo tell you that the flyer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 16                                                                                                                        | might have gathered from other previously                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 17                                                                                                             | described why the students were protesting?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 17                                                                                                                        | undisclosed sources as currently phrased.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 18                                                                                                             | MR. KESLAR; Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 18                                                                                                                        | So I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 19                                                                                                             | Same instruction. Do not answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 19                                                                                                                        | answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 20                                                                                                             | Q. Did Dr. Raimondo tell you that you could 15:04:39                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 20                                                                                                                        | Q. Did you personally observe individuals 15:06:49                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 21                                                                                                             | have the flyer if you wanted it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 21                                                                                                                        | taking your picture as you were talking to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 22                                                                                                             | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 22                                                                                                                        | Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 23                                                                                                             | Same instruction. Do not answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 23                                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 24                                                                                                             | Q. Did Dr. Raimondo make clear to you that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 24                                                                                                                        | Q. Did you personally observe individuals                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 25                                                                                                             | she was not speaking on behalf of the Oberlin 15:04:54                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 25                                                                                                                        | taking your picture as Dr. Raimondo handed you 15:07:03                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| ]                                                                                                              | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                           | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                           | Page 177                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | ,                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1                                                                                                              | students?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1                                                                                                                         | the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 2                                                                                                              | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                           | A NY_                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2                                                                                                                         | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                                | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 3                                                                                                                         | Q. So you were given this flyer by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4                                                                                                              | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 3<br>4                                                                                                                    | Q. So you were given this flyer by Dr. Raimondo, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4<br>5                                                                                                         | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  15:05:06                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 3<br>4<br>5                                                                                                               | Q. So you were given this flyer by Dr. Raimondo, correct? A. Yes. 15:07:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4<br>5<br>6                                                                                                    | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3<br>4<br>5<br>6                                                                                                          | Q. So you were given this flyer by Dr. Raimondo, correct? A. Yes. 15:07:16 Q. Did you read it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4<br>5<br>6<br>7                                                                                               | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 3<br>4<br>5<br>6<br>7                                                                                                     | Q. So you were given this flyer by Dr. Raimondo, correct? A. Yes. 15:07:16 Q. Did you read it? A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4<br>5<br>6                                                                                                    | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 3<br>4<br>5<br>6<br>7<br>8                                                                                                | <ul> <li>Q. So you were given this flyer by</li> <li>Dr. Raimondo, correct?</li> <li>A. Yes.</li> <li>Q. Did you read it?</li> <li>A. Yes.</li> <li>Q. Okay. Did you read the entire flyer?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9                                                                                     | I'm going to instruct you not to answer. Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First Amendment privilege. I'm instructing you not to answer. Q. Did you take the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3<br>4<br>5<br>6<br>7<br>8                                                                                                | Q. So you were given this flyer by Dr. Raimondo, correct? A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9                                                                                     | I'm going to instruct you not to answer. Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First Amendment privilege. I'm instructing you not to answer. Q. Did you take the flyer? A Yes. 15:05:15                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | <ul> <li>Q. So you were given this flyer by</li> <li>Dr. Raimondo, correct?</li> <li>A. Yes. 15:07:16</li> <li>Q. Did you read it?</li> <li>A. Yes.</li> <li>Q. Okay. Did you read the entire flyer?</li> <li>A. Yes.</li> <li>Q. Okay. Do you recall any specific words 15:07:26</li> </ul>                                                                                                                                                                                                                                                                                                                                                 |
| 4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | I'm going to instruct you not to answer. Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege. I'm instructing you not to answer. Q. Did you take the flyer? A. Yes. Q. Okay. Which hand did you use to accept                                                                                                                                                                                                                                                                                                                                                                                                                          | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | <ul> <li>Q. So you were given this flyer by</li> <li>Dr. Raimondo, correct?</li> <li>A. Yes.</li> <li>Q. Did you read it?</li> <li>A. Yes.</li> <li>Q. Okay. Did you read the entire flyer?</li> <li>A. Yes.</li> <li>Q. Okay. Do you recall any specific words</li> <li>that were contained on the flyer?</li> </ul>                                                                                                                                                                                                                                                                                                                        |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?                                                                                                                                                                                                                                                                                                                                                                                                | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | Q. So you were given this flyer by Dr. Raimondo, correct? A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words that were contained on the flyer? A. Yes. A. Yes.                                                                                                                                                                                                                                                                                                                                                                                           |
| 4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.                                                                                                                                                                                                                                                                                                                                                    | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | Q. So you were given this flyer by Dr. Raimondo, correct? A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words that were contained on the flyer? A. Yes. Q. Okay. What words?                                                                                                                                                                                                                                                                                                                                                                              |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | I'm going to instruct you not to answer. Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First Amendment privilege. I'm instructing you not to answer. Q. Did you take the flyer? A. Yes.  15:05:15 Q. Okay. Which hand did you use to accept the flyer? A. I have no way of knowing that for sure. Q. Are you right-handed or left-handed?                                                                                                                                                                                                                                                                                                                   | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist                                                                                                                                                                                                                                                                                                                                   |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | I'm going to instruct you not to answer. Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First Amendment privilege. I'm instructing you not to answer. Q. Did you take the flyer? A. Yes.  15:05:15 Q. Okay. Which hand did you use to accept the flyer? A. I have no way of knowing that for sure. Q. Are you right-handed or left-handed? A. I'm right-handed.  15:05:32                                                                                                                                                                                                                                                                                    | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42                                                                                                                                                                                                                                                                                                  |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with                                                                                                                                                                                                                                   | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the                                                                                                                                                                                                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?                                                                                                                                                                                                                  | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer?                                                                                                                                                                                                                                                |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.                                                                                                                                                                                                   | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim                                                                                                                                                                                                       |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than                                                                                                                                                          | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim wording of the flyer.                                                                                                                                                                                 |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than your left hand in terms of normal day-to-day  15:05:40                                                                                                   | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim wording of the flyer. Q. Okay. Can you give me any verbatim or 15:07:54                                                                                                                               |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than                                                                                                                                                          | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. Im not able to give you the verbatim wording of the flyer. Q. Okay. Can you give me any verbatim or any quotations from the flyer?                                                                                                          |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than your left hand in terms of normal day-to-day  living activities?  A. Yes, I do.                                                                          | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim wording of the flyer. Q. Okay. Can you give me any verbatim or any quotations from the flyer? A. Not off the top of my head without a                                                                 |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than your left hand in terms of normal day-to-day  living activities?                                                                                         | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim wording of the flyer. Q. Okay. Can you give me any verbatim or any quotations from the flyer? A. Not off the top of my head without a source document, no.                                            |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than your left hand in terms of normal day-to-day  living activities?  A. Yes, I do.  Q. Okay. So when Dr. Raimondo handed you this flower flyer strike that. | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim wording of the flyer. Q. Okay. Can you give me any verbatim or any quotations from the flyer? A. Not off the top of my head without a source document, no. Q. By "a source document," are you talking |
| 4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | I'm going to instruct you not to answer.  Q. So what did Dr. Raimondo say to you as she handed you the flyer?  MR. KESLAR: Same objection. First  Amendment privilege.  I'm instructing you not to answer.  Q. Did you take the flyer?  A. Yes.  15:05:15  Q. Okay. Which hand did you use to accept the flyer?  A. I have no way of knowing that for sure.  Q. Are you right-handed or left-handed?  A. I'm right-handed.  15:05:32  Q. Okay. Does that mean you write with your right hand?  A. Yes, I do.  Q. Do you use your right hand more than your left hand in terms of normal day-to-day  living activities?  A. Yes, I do.  Q. Okay. So when Dr. Raimondo handed you                                | 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | Q. So you were given this flyer by Dr. Raimondo, correct?  A. Yes. 15:07:16 Q. Did you read it? A. Yes. Q. Okay. Did you read the entire flyer? A. Yes. Q. Okay. Do you recall any specific words 15:07:26 that were contained on the flyer? A. Yes. Q. Okay. What words? A. It indicated that Gibson's is a racist establishment. 15:07:42 Q. So which of those words appeared on the flyer? A. I'm not able to give you the verbatim wording of the flyer. Q. Okay. Can you give me any verbatim or any quotations from the flyer? A. Not off the top of my head without a source document, no.                                            |

|                                                                                                                    | Page 178                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                          | Page 180                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                  | A. If you gave me the flyer, I could read                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1                                                                                                                        | camera.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2                                                                                                                  | it. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2                                                                                                                        | Q. Do you believe that in her capacity as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3                                                                                                                  | Q. Okay. But my question is, without the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3                                                                                                                        | dean of students at Oberlin College she acted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4                                                                                                                  | flyer in hand, you don't recall specifically any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 4                                                                                                                        | appropriately?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 5                                                                                                                  | of the words that the flyer used; is that 15:08:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                                        | MR. KESLAR: Objection. Goes to state 15:10:56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 6                                                                                                                  | correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 6                                                                                                                        | of mind, editorial process, First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7                                                                                                                  | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 7                                                                                                                        | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 8                                                                                                                  | Q. Did you read every sentence of the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 8                                                                                                                        | I'm going to instruct you not to answer                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 9                                                                                                                  | flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9                                                                                                                        | that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10                                                                                                                 | A. Yes. 15:08:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 10                                                                                                                       | Q. Did you tell Dr. Raimondo to stop 15:11:02                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 11                                                                                                                 | Q. Did Dr. Raimondo allow you to read the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 11                                                                                                                       | blocking your view?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12                                                                                                                 | flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 12                                                                                                                       | MR. KESLAR: Again, what you said during                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 13                                                                                                                 | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 13                                                                                                                       | that conversation is protected by the First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 14                                                                                                                 | Q. What did you do after reading the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 14                                                                                                                       | Amendment privilege, so I'm going to instruct you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 15                                                                                                                 | A. Could you be more specific? 15:08:50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 15                                                                                                                       | not to answer. 15:11:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 16                                                                                                                 | Q. Sure. So you've testified that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 16                                                                                                                       | <ul> <li>Q. Did you tell Dr. Raimondo that you did</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 17                                                                                                                 | Dr. Raimondo gave you the flyer, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 17                                                                                                                       | not want to speak to her?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 18                                                                                                                 | A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 18                                                                                                                       | MR. KESLAR: The question calls for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 19                                                                                                                 | Q. Then you read it, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 19                                                                                                                       | First Amendment privilege information, so I'm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 20                                                                                                                 | A. Yes, sir. 15:09:05                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 20                                                                                                                       | going to instruct you not to answer. 15:11:29                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 21                                                                                                                 | Q. So after reading the flyer, what                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 21                                                                                                                       | Q. Did you tell Dr. Raimondo that she was                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 22                                                                                                                 | happened next?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 22                                                                                                                       | interfering with your attempt to do your job as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 23                                                                                                                 | A. I don't recall the order of events.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 23                                                                                                                       | an editor?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 24                                                                                                                 | Q. Did you put the flyer in your pocket?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 24                                                                                                                       | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 25                                                                                                                 | A. I don't know. 15:09:23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 25                                                                                                                       | Instruct you not to answer. 15:11:40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                    | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                    | Page 179                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                          | Page 181                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 1                                                                                                                  | •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1                                                                                                                        | Page 181  Q. Did you tell Dr. Raimondo that she was                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1 2                                                                                                                | Q. Did you tear up the flyer?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1 2                                                                                                                      | •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2                                                                                                                  | Q. Did you tear up the flyer? A. No, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                          | Q. Did you tell Dr. Raimondo that she was                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2<br>3                                                                                                             | <ul><li>Q. Did you tear up the flyer?</li><li>A. No, sir.</li><li>Q. Did you give the flyer to someone else?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2                                                                                                                        | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4                                                                                                        | <ul><li>Q. Did you tear up the flyer?</li><li>A. No, sir.</li><li>Q. Did you give the flyer to someone else?</li><li>MR. KESLAR: Objection. That calls for</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2                                                                                                                        | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2<br>3<br>4<br>5                                                                                                   | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?</li> <li>MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and 15:09:39</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4                                                                                                              | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6                                                                                              | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?</li> <li>MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2<br>3<br>4<br>5                                                                                                         | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                         | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?</li> <li>MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6                                                                                                    | <ul> <li>Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?</li> <li>MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52 </li> <li>Q. Have you seen any pictures of you and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                    | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else? MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7                                                                                               | <ul> <li>Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?</li> <li>MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52 Q. Have you seen any pictures of you and Dr. Raimondo? A. No.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                               | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else? MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?</li> <li>MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52 Q. Have you seen any pictures of you and Dr. Raimondo?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                               | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  15:09:51</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?</li> <li>MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52 Q. Have you seen any pictures of you and Dr. Raimondo? A. No. Q. Have you seen any video of you and </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                         | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  15:09:51</li> <li>Q. Did you write on the flyer?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No.  Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                   | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  15:09:51</li> <li>Q. Did you write on the flyer?</li> <li>A. I don't recall doing so.</li> </ul>                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                       | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one. 15:09:51</li> <li>Q. Did you write on the flyer?</li> <li>A. I don't recall doing so.</li> <li>Q. So how long after you received this</li> </ul>                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No.  Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                 | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  15:09:51</li> <li>Q. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with</li> </ul>                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the                                                                                                                                                                                                                                                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                           | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  O. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with Dr. Raimondo?  15:10:06</li> </ul>                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the                                                                                                                                                                                                                                                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                           | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  O. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with Dr. Raimondo?  15:10:06  A. A short time.</li> </ul>                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with 15:12:36                                                                                                                                                                                                                                                                    |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                               | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  15:09:51</li> <li>Q. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with Dr. Raimondo?  15:10:06</li> <li>A. A short time.</li> <li>Q. What do you consider to be a short time?</li> </ul>                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with 15:12:36 source information.                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                         | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  Q. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with Dr. Raimondo?  15:10:06  A. A short time. Q. What do you consider to be a short time? A. A few minutes.</li> </ul>                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment                                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                         | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one.  15:09:51</li> <li>Q. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with Dr. Raimondo?  15:10:06</li> <li>A. A short time. Q. What do you consider to be a short time?</li> <li>A. A few minutes.</li> <li>Q. Okay. In your interaction with</li> </ul>                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment privilege.                                                                                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20             | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?  MR. KESLAR: Objection. That calls for two privileges, both the reporter's privilege and potentially the editorial process privilege as to what he did with the information that he gathered during a news-gathering process. It's a First Amendment privilege.  I instruct you not to answer that one. 15:09:51</li> <li>Q. Did you write on the flyer?  A. I don't recall doing so. Q. So how long after you received this flyer did you end your conversation with Dr. Raimondo? 15:10:06</li> <li>A. A short time. Q. What do you consider to be a short time? A. A few minutes. Q. Okay. In your interaction with Dr. Raimondo, was she polite? 15:10:28</li> </ul>                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment privilege.  Q. So other than the fact that Dr. Raimondo 15:12:45                                                                                                         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21       | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo?  15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment privilege.  Q. So other than the fact that Dr. Raimondo twice blocked your view with her body, you don't                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22 | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?     MR. KESLAR: Objection. That calls for     two privileges, both the reporter's privilege and potentially the editorial process privilege as to     what he did with the information that he gathered during a news-gathering process. It's a First     Amendment privilege.     I instruct you not to answer that one. 15:09:51     Q. Did you write on the flyer?     A. I don't recall doing so.     Q. So how long after you received this flyer did you end your conversation with     Dr. Raimondo? 15:10:06     A. A short time.     Q. What do you consider to be a short time?     A. A few minutes.     Q. Okay. In your interaction with     Dr. Raimondo, was she polite?     A. With the exception of blocking the camera.</li> </ul> | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment privilege.  Q. So other than the fact that Dr. Raimondo twice blocked your view with her body, you don't take exception with how she conducted herself; is               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>20<br>21<br>22<br>23 | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment privilege.  Q. So other than the fact that Dr. Raimondo twice blocked your view with her body, you don't take exception with how she conducted herself; is that correct? |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22 | <ul> <li>Q. Did you tear up the flyer?</li> <li>A. No, sir.</li> <li>Q. Did you give the flyer to someone else?     MR. KESLAR: Objection. That calls for     two privileges, both the reporter's privilege and potentially the editorial process privilege as to     what he did with the information that he gathered during a news-gathering process. It's a First     Amendment privilege.     I instruct you not to answer that one. 15:09:51     Q. Did you write on the flyer?     A. I don't recall doing so.     Q. So how long after you received this flyer did you end your conversation with     Dr. Raimondo? 15:10:06     A. A short time.     Q. What do you consider to be a short time?     A. A few minutes.     Q. Okay. In your interaction with     Dr. Raimondo, was she polite?     A. With the exception of blocking the camera.</li> </ul> | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q. Did you tell Dr. Raimondo that she was frustrating your efforts to cover a newsworthy event?  MR. KESLAR: Same objection. Instruct you not to answer. 15:11:52  Q. Have you seen any pictures of you and Dr. Raimondo?  A. No. Q. Have you seen any video of you and Dr. Raimondo? 15:12:13  A. No. Q. Do you know where that flyer is today that you were handed by Dr. Raimondo?  MR. KESLAR: Objection. Goes to the editorial process, what might have been done with source information.  So I'm going to instruct you not to answer that based on your First Amendment privilege.  Q. So other than the fact that Dr. Raimondo twice blocked your view with her body, you don't take exception with how she conducted herself; is               |

|                                                                                                                               | Page 182                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                          | Page 184                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                             | his observations that day. It goes to his state                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1                                                                                                                        | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2                                                                                                                             | of mind as an editor, and so I'm going to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2                                                                                                                        | Q. How well do you know Bruce Bishop?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3                                                                                                                             | instruct him not to answer based on his First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 3                                                                                                                        | A. Not well.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4                                                                                                                             | Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4                                                                                                                        | Q. Okay. You're not friends with him?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5                                                                                                                             | Q. Did you call the police on Dr. Raimondo? 15:13:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 5                                                                                                                        | A. No. 15:15:37                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6'                                                                                                                            | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6                                                                                                                        | Q. Okay. Have you ever socialized with                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7                                                                                                                             | Q. As she was talking to you, did you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 7                                                                                                                        | him?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8                                                                                                                             | believe that she possessed a First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 8                                                                                                                        | A. What do you mean by socialize?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 9                                                                                                                             | right?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 9                                                                                                                        | Q. Have you ever had dinner with him? A. No. 15:15:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10                                                                                                                            | MR. KESLAR: Objection to what he 15:13:31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 10                                                                                                                       | A. No. 15:15:48 Q. Had a drink?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 11                                                                                                                            | believed. Within the editorial process, his                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 11<br>12                                                                                                                 | w.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 12                                                                                                                            | state of mind is protected by the First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 13                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 13                                                                                                                            | Amendment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 14                                                                                                                       | Q. Gone to a baseball game?  A. Also possible, but I don't know for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 14<br>15                                                                                                                      | So I'll instruct you not to answer.  Q. So again, we've spent some time talking 15:13:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 15                                                                                                                       | sure. 15:16:09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 16                                                                                                                            | about all the events that took place on Thursday,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 16                                                                                                                       | Q. Basketball game?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 17                                                                                                                            | November 10th, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 17                                                                                                                       | A. Not to my knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 18                                                                                                                            | A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 18                                                                                                                       | Q. Football game?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 19                                                                                                                            | Q. Do you recall anything else that you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 19                                                                                                                       | A. Not to my knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 20                                                                                                                            | personally observed when you were at the 15:13:52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 20                                                                                                                       | Q. Breakfast? 15:16:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 21                                                                                                                            | demonstration on November 10th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 21                                                                                                                       | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 22                                                                                                                            | MR. KESLAR: I'm going to object because                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 22                                                                                                                       | Q. Lunch?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 23                                                                                                                            | it calls for — it potentially calls for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 23                                                                                                                       | A. It is possible, but I don't know for                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 24                                                                                                                            | information that's not included within his news                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 24                                                                                                                       | sure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                                               | articles and has also been the subject of many 15:14:06                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 25                                                                                                                       | Q. Did Bruce show you any of his pictures 15:16:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 25                                                                                                                            | articles and has also been the subject of many 15.14.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 25                                                                                                                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | •                                                                                                                        | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 25                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 25                                                                                                                            | Molnar Reporting Services, LLC (440) 340-6161  Page 183                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                                                        | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                               | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1 2                                                                                                                      | Molnar Reporting Services, LLC (440) 340-6161  Page 185                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1                                                                                                                             | Molnar Reporting Services, LLC (440) 340-6161  Page 183 objections here today.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161  Page 185 that he had taken on November 10th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1<br>2                                                                                                                        | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2                                                                                                                        | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1<br>2<br>3                                                                                                                   | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5                                                                                                         | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based 15:16:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1<br>2<br>3<br>4                                                                                                              | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6                                                                                                    | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based 15:16:44 on the First Amendment privilege, and I'm going                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1<br>2<br>3<br>4<br>5                                                                                                         | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7                                                                                               | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based 15:16:44 on the First Amendment privilege, and I'm going to instruct you not to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1<br>2<br>3<br>4<br>5<br>6                                                                                                    | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | Moinar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that.  Q. Did you two talk about the demonstration                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1<br>2<br>3<br>4<br>5<br>6                                                                                                    | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | Moinar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that.  Q. Did you two talk about the demonstration after November 10th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | Moinar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group                                                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | Moinar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | Moinar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you                                                                                                                                                                                                                                                                                                                                                                            |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question. A. Yes.                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media                                                                                                                                                                                                                                                                                                                              |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question. A. Yes. Q. Okay. Who did you personally observe?                                                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?                                                                                                                                                                                                                                                                               |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.  A. Yes.  Q. Okay. Who did you personally observe?  A. Bruce Bishop. 15:14:49                                                                                                                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12                                                                                                                                                                                                                                                              |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.  A. Yes.  Q. Okay. Who did you personally observe?  A. Bruce Bishop. 15:14:49  Q. B-I-S-H-O-P?                                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm poing to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media                                                                                                                                                                                                                                   |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.  A. Yes.  Q. Okay. Who did you personally observe?  A. Bruce Bishop. 15:14:49  Q. B-I-S-H-O-P?  A. I believe that's how he spells it.                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event?                                                                                                                                                                                                |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question. A. Yes. Q. Okay. Who did you personally observe? A. Bruce Bishop. 15:14:49 Q. B-I-S-H-O-P? A. I believe that's how he spells it. Q. Okay. Who is he?                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event? A. I don't know.                                                                                                                                                                               |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question. A. Yes. Q. Okay. Who did you personally observe? A. Bruce Bishop. 15:14:49 Q. B-I-S-H-O-P? A. I believe that's how he spells it. Q. Okay. Who is he? A. He is a photographer for the Chronicle                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event? A. I don't know. Q. Can you describe for me the racial                                                                                                                                         |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question. A. Yes. Q. Okay. Who did you personally observe? A. Bruce Bishop. 15:14:49 Q. B-I-S-H-O-P? A. I believe that's how he spells it. Q. Okay. Who is he? A. He is a photographer for the Chronicle Telegram. 15:15:05                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event? A. I don't know. Q. Can you describe for me the racial composition of the demonstrators on November 10? 15:17:33                                                                               |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today. And so I'm going to instruct you not to answer that. Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration? MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question. A. Yes. Q. Okay. Who did you personally observe? A. Bruce Bishop. 15:14:49 Q. B-I-S-H-O-P? A. I believe that's how he spells it. Q. Okay. Who is he? A. He is a photographer for the Chronicle Telegram. 15:15:05 Q. Do you know for how long he's been with                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based 15:16:44 on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event? A. I don't know. Q. Can you describe for me the racial composition of the demonstrators on November 10? 15:17:33 A. It was mixed.                                                     |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.  A. Yes.  Q. Okay. Who did you personally observe?  A. Bruce Bishop. 15:14:49  Q. B-I-S-H-O-P?  A. I believe that's how he spells it.  Q. Okay. Who is he?  A. He is a photographer for the Chronicle  Telegram. 15:15:05  Q. Do you know for how long he's been with the Chronicle Telegram?         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm 15:16:56 going to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event? A. I don't know. Q. Can you describe for me the racial composition of the demonstrators on November 10? 15:17:33 A. It was mixed. Q. Okay. Mixed in what way?                                  |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.  A. Yes.  Q. Okay. Who did you personally observe?  A. Bruce Bishop. 15:14:49  Q. B-I-S-H-O-P?  A. I believe that's how he spells it.  Q. Okay. Who is he?  A. He is a photographer for the Chronicle  Telegram. 15:15:05  Q. Do you know for how long he's been with the Chronicle Telegram?  A. No. | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm poing to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event?  A. I don't know. Q. Can you describe for me the racial composition of the demonstrators on November 10? 15:17:33  A. It was mixed. Q. Okay. Mixed in what way?                                         |
| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Molnar Reporting Services, LLC (440) 340-6161  Page 183  objections here today.  And so I'm going to instruct you not to answer that.  Q. Did you recognize on November 10th any other members of the news media who were present 15:14:17 for the demonstration?  MR. KESLAR: To the extent the question calls for anybody with the Oberlin news times you haven't previously identified, I'm going to instruct you not to answer that. To the extent 15:14:36 it's somebody outside of your own editorial group of people, you can answer that question.  A. Yes.  Q. Okay. Who did you personally observe?  A. Bruce Bishop. 15:14:49  Q. B-I-S-H-O-P?  A. I believe that's how he spells it.  Q. Okay. Who is he?  A. He is a photographer for the Chronicle  Telegram. 15:15:05  Q. Do you know for how long he's been with the Chronicle Telegram?         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Molnar Reporting Services, LLC (440) 340-6161  Page 185  that he had taken on November 10th?  A. No. Q. Did you two talk about the demonstration on November 10th?  MR. KESLAR: I'm going to object based on the First Amendment privilege, and I'm going to instruct you not to answer that. Q. Did you two talk about the demonstration after November 10th?  MR. KESLAR: Same objection, so I'm poing to instruct you not to answer. Q. Other than Bruce Bishop, did you personally observe other members of the media present at the demonstration on November 10th?  A. No. 15:17:12 Q. Was there someone from the media live-streaming the event?  A. I don't know. Q. Can you describe for me the racial composition of the demonstrators on November 10? 15:17:33  A. It was mixed. Q. Okay. Mixed in what way? A. There were people of different races |

|                                                                | Page 186                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                | Page 188                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                              | you would break down the specific races of the                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                              | MR. KESLAR: For my edification, you                                                                                                                                                                                                                                                                                                                                            |
| 2                                                              | people who were present on November 10th?                                                                                                                                                                                                                                                                                                                                                                                                     | 2                                                              | were regarding the profanity, right?                                                                                                                                                                                                                                                                                                                                           |
| 3                                                              | A. The composition was more diversified                                                                                                                                                                                                                                                                                                                                                                                                       | 3                                                              | MR. HOLMAN: Yes. Uh-huh.                                                                                                                                                                                                                                                                                                                                                       |
| 4                                                              | than the City of Oberlin's population is.                                                                                                                                                                                                                                                                                                                                                                                                     | 4                                                              | MR. KESLAR: Okay.                                                                                                                                                                                                                                                                                                                                                              |
| 5                                                              | Q. What can you tell me about the diversity 15:18:11                                                                                                                                                                                                                                                                                                                                                                                          | 5                                                              | A. I wouldn't be able to tell you a year 15:20:55                                                                                                                                                                                                                                                                                                                              |
| 6                                                              | of Oberlin's city population?                                                                                                                                                                                                                                                                                                                                                                                                                 | 6                                                              | and a half later the exact words that they used.                                                                                                                                                                                                                                                                                                                               |
| 7                                                              | A. I believe according to the last census                                                                                                                                                                                                                                                                                                                                                                                                     | 7                                                              | Q. So you don't recall any of the profane                                                                                                                                                                                                                                                                                                                                      |
| 8                                                              | it was somewhere around 12 or 15 percent black,                                                                                                                                                                                                                                                                                                                                                                                               | 8                                                              | language that they used?                                                                                                                                                                                                                                                                                                                                                       |
| 9                                                              | with the vast majority being white.                                                                                                                                                                                                                                                                                                                                                                                                           | 9                                                              | A. Now that you put it a separate way, I                                                                                                                                                                                                                                                                                                                                       |
| 10                                                             | Q. Okay. So if I understand your testimony 15:18:33                                                                                                                                                                                                                                                                                                                                                                                           | 10                                                             | can recall several people using the F-word toward 15:21:13                                                                                                                                                                                                                                                                                                                     |
| 11                                                             | correctly, you're saying that the demonstrators                                                                                                                                                                                                                                                                                                                                                                                               | 11                                                             | me, specifically.                                                                                                                                                                                                                                                                                                                                                              |
| 12                                                             | were comprised of some percentage of black                                                                                                                                                                                                                                                                                                                                                                                                    | 12                                                             | Q. Okay. And what exactly did they say to                                                                                                                                                                                                                                                                                                                                      |
| 13                                                             | protestors that exceeded 15 percent?                                                                                                                                                                                                                                                                                                                                                                                                          | 13                                                             | you?                                                                                                                                                                                                                                                                                                                                                                           |
| 14                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                       | 14                                                             | A. There were many people shouting many                                                                                                                                                                                                                                                                                                                                        |
| 15                                                             | Q. Okay. And the percentage of white 15:18:54                                                                                                                                                                                                                                                                                                                                                                                                 | 15                                                             | things. 15:21:28                                                                                                                                                                                                                                                                                                                                                               |
| 16                                                             | participants as demonstrators were below the city                                                                                                                                                                                                                                                                                                                                                                                             | 16                                                             | Q. Okay. What were they shouting?                                                                                                                                                                                                                                                                                                                                              |
| 17                                                             | average?                                                                                                                                                                                                                                                                                                                                                                                                                                      | 17                                                             | MR. KESLAR: To the extent that you                                                                                                                                                                                                                                                                                                                                             |
| 18                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                       | 18                                                             | haven't already disclosed it and it hasn't been                                                                                                                                                                                                                                                                                                                                |
| 19                                                             | Q. Was it 50/50 in terms of 50 percent                                                                                                                                                                                                                                                                                                                                                                                                        | 19                                                             | disclosed in a news article, I'm going to assert                                                                                                                                                                                                                                                                                                                               |
| 20                                                             | black and 50 percent white? 15:19:12                                                                                                                                                                                                                                                                                                                                                                                                          | 20                                                             | a First Amendment privilege and instruct you not 15:21:40                                                                                                                                                                                                                                                                                                                      |
| 21                                                             | A. I'd say it was closer to 50/50 than it                                                                                                                                                                                                                                                                                                                                                                                                     | 21                                                             | to answer anything further.                                                                                                                                                                                                                                                                                                                                                    |
| 22                                                             | was to 15/85.                                                                                                                                                                                                                                                                                                                                                                                                                                 | 22                                                             | Q. Okay. So you believe that there was                                                                                                                                                                                                                                                                                                                                         |
| 23                                                             | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                      | 23                                                             | profanity directed to you, correct?                                                                                                                                                                                                                                                                                                                                            |
| 24                                                             | A. And there were people of other races                                                                                                                                                                                                                                                                                                                                                                                                       | 24                                                             | A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                   |
| 25                                                             | there as well. Or, I'm sorry, ethnicities. 15:19:27                                                                                                                                                                                                                                                                                                                                                                                           | 25                                                             | Q. Can you identify what those statements 15:21:49                                                                                                                                                                                                                                                                                                                             |
| 20                                                             | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                  |
|                                                                | Page 187                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                | Page 189                                                                                                                                                                                                                                                                                                                                                                       |
| 1                                                              | Q. Do you recall any of the specific signs                                                                                                                                                                                                                                                                                                                                                                                                    | 1                                                              | were?                                                                                                                                                                                                                                                                                                                                                                          |
| 2                                                              | that you saw?                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2                                                              | A. Is that is that not the same question                                                                                                                                                                                                                                                                                                                                       |
| 3                                                              | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                        | 3                                                              | that was just asked?                                                                                                                                                                                                                                                                                                                                                           |
| 4                                                              | Q. Did the protestors block ingress and                                                                                                                                                                                                                                                                                                                                                                                                       | 4                                                              | MR. KESLAR: This question is restricted                                                                                                                                                                                                                                                                                                                                        |
| 5                                                              | egress to Gibson's Bakery? 15:19:44                                                                                                                                                                                                                                                                                                                                                                                                           | 5                                                              | just to the profanity, and so I would instruct 15:22:04                                                                                                                                                                                                                                                                                                                        |
| 6                                                              | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                        | 6                                                              | you not to go beyond the profanity.                                                                                                                                                                                                                                                                                                                                            |
| 7                                                              | Q. Were people going in to shop at Gibson's                                                                                                                                                                                                                                                                                                                                                                                                   | 7                                                              | A. They were yelling things such as F you,                                                                                                                                                                                                                                                                                                                                     |
| 8                                                              | Bakery on November 10?                                                                                                                                                                                                                                                                                                                                                                                                                        | 8                                                              | F off, et cetera,                                                                                                                                                                                                                                                                                                                                                              |
| 9                                                              | A. Yes. I saw a few go in and out.                                                                                                                                                                                                                                                                                                                                                                                                            | 9                                                              | Q. So F you and F off, correct?                                                                                                                                                                                                                                                                                                                                                |
| 10                                                             | O. Okay. Were the demonstrators using 15:20:06                                                                                                                                                                                                                                                                                                                                                                                                | 10                                                             | A. Yes. 15:22:21                                                                                                                                                                                                                                                                                                                                                               |
| 11                                                             | profanity?                                                                                                                                                                                                                                                                                                                                                                                                                                    | 11                                                             | Q. Okay. Do you recall any other things of                                                                                                                                                                                                                                                                                                                                     |
| 12                                                             | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                       | 12                                                             | a profane nature that were being directed to you?                                                                                                                                                                                                                                                                                                                              |
|                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                               | 13                                                             | A. I was called a honky, which was                                                                                                                                                                                                                                                                                                                                             |
| 13                                                             | () What were they saving?                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                |                                                                                                                                                                                                                                                                                                                                                                                |
| 13<br>14                                                       | Q. What were they saying?  MR KESLAR: I'm going to object, except                                                                                                                                                                                                                                                                                                                                                                             | 14                                                             |                                                                                                                                                                                                                                                                                                                                                                                |
| 14                                                             | MR. KESLAR: I'm going to object, except                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                | interesting.                                                                                                                                                                                                                                                                                                                                                                   |
| 14<br>15                                                       | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21                                                                                                                                                                                                                                                                                                                                                | 14<br>15                                                       | interesting.  Q. Okay. What other comments were directed 15:22:37                                                                                                                                                                                                                                                                                                              |
| 14<br>15<br>16                                                 | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was                                                                                                                                                                                                                                                                                               | 14<br>15<br>16                                                 | interesting.  Q. Okay. What other comments were directed 15:22:37 at you that you took offense to?                                                                                                                                                                                                                                                                             |
| 14<br>15<br>16<br>17                                           | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct                                                                                                                                                                                                                                               | 14<br>15<br>16<br>17                                           | interesting.  Q. Okay. What other comments were directed 15:22:37 at you that you took offense to?  MR. KESLAR: I'm going to instruct you                                                                                                                                                                                                                                      |
| 14<br>15<br>16<br>17<br>18                                     | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did                                                                                                                                                                                             | 14<br>15<br>16<br>17<br>18                                     | interesting.  Q. Okay. What other comments were directed at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything                                                                                                                                                                                                   |
| 14<br>15<br>16<br>17<br>18                                     | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can                                                                                                                                               | 14<br>15<br>16<br>17<br>18<br>19                               | interesting.  Q. Okay. What other comments were directed at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.                                                                                                                                                                        |
| 14<br>15<br>16<br>17<br>18<br>19                               | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can respond. 15:20:30                                                                                                                             | 14<br>15<br>16<br>17<br>18<br>19<br>20                         | interesting.  Q. Okay. What other comments were directed 15:22:37 at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.  A. Middle fingers, that sort of thing. 15:22:59                                                                                                              |
| 14<br>15<br>16<br>17<br>18<br>19<br>20                         | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can respond. 15:20:30  A. Yes, they were using profanity.                                                                                         | 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | interesting.  Q. Okay. What other comments were directed at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.  A. Middle fingers, that sort of thing. 15:22:59  Q. Okay. So other than F —                                                                                           |
| 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can respond. 15:20:30  A. Yes, they were using profanity.  Q. Okay. You personally observed some of                                               | 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | interesting.  Q. Okay. What other comments were directed 15:22:37 at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.  A. Middle fingers, that sort of thing. 15:22:59  Q. Okay. So other than F –  A. And for the record, I didn't                                                 |
| 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can respond. 15:20:30  A. Yes, they were using profanity.  Q. Okay. You personally observed some of the protestors using profanity?               | 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | interesting.  Q. Okay. What other comments were directed at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.  A. Middle fingers, that sort of thing.  Q. Okay. So other than F –  A. And for the record, I didn't particularly take offense to much of it, but —                    |
| 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can respond. 15:20:30  A. Yes, they were using profanity.  Q. Okay. You personally observed some of the protestors using profanity?  A. Yes, sir. | 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | interesting.  Q. Okay. What other comments were directed at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.  A. Middle fingers, that sort of thing. 15:22:59  Q. Okay. So other than F –  A. And for the record, I didn't particularly take offense to much of it, but –  Q. Okay. |
| 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | MR. KESLAR: I'm going to object, except to the extent that you already disclosed that 15:20:21 information in a news article. Anything that was not previously disclosed, I'm going to instruct you not to answer, but to the extent that you did disclose something in a news article, you can respond. 15:20:30  A. Yes, they were using profanity.  Q. Okay. You personally observed some of the protestors using profanity?               | 14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | interesting.  Q. Okay. What other comments were directed 15:22:37 at you that you took offense to?  MR. KESLAR: I'm going to instruct you to limit your answer to profanity. Anything beyond that is privileged.  A. Middle fingers, that sort of thing. 15:22:59  Q. Okay. So other than F –  A. And for the record, I didn't particularly take offense to much of it, but —  |

|                                                                                                                          | Page 190                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                | Page 192                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                        | offensive.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                                                                                                                              | the record, 3:25.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2                                                                                                                        | Q. Right. But you weren't offended?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2                                                                                                                              | (Discussion off record.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3                                                                                                                        | A. Not particularly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 3                                                                                                                              | (Whereupon, Ms. Crocker left the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 4                                                                                                                        | Q. Okay. So some of the demonstrators told                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4                                                                                                                              | conference room.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5                                                                                                                        | you to F you, they told you to F off, and they 15:23:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 5                                                                                                                              | MR. HOLMAN: Let's go back on the 15:28:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 6                                                                                                                        | gave you a middle finger.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6                                                                                                                              | record, please.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 7                                                                                                                        | Is there anything else that the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7                                                                                                                              | VIDEOGRAPHER: On the record, 3:27.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 8                                                                                                                        | protestors said or did that one might consider to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 8                                                                                                                              | Q. So, Mr. Hawk, prior to the shoplifting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 9                                                                                                                        | be of a profane nature?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 9                                                                                                                              | incident at Gibson's Bakery, November 2016, had                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10                                                                                                                       | MR. KESLAR: I'm going to object, 15:23:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 10                                                                                                                             | you seen any other news articles in the Tribune 15:28:33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11                                                                                                                       | because that question calls for your state of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 11                                                                                                                             | regarding Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12                                                                                                                       | mind, which invades on the editorial process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 12                                                                                                                             | A. I may have.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 13                                                                                                                       | So I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 13                                                                                                                             | Q. Prior to that date, had you seen                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 14                                                                                                                       | answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 14                                                                                                                             | articles in other newspapers regarding the bakery? 15:29:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 15                                                                                                                       | Q. Have you talked to Lisa Hawk, your wife, 15:24:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 15<br>16                                                                                                                       | bakery? 15:29:00  A. Not to my knowledge.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 16                                                                                                                       | about what took place at the demonstration on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 17                                                                                                                             | Q. Prior to November 2016, had you seen any                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 17                                                                                                                       | November 10th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 18                                                                                                                             | articles in the Tribune that referenced David                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 18                                                                                                                       | MR, KESLAR: Objection. I think there's certainly marital privilege about what might get                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 19                                                                                                                             | Gibson in the Tribune?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 19<br>20                                                                                                                 | discussed among spouses, and so we're going to 15:24:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 20                                                                                                                             | A. Not to my knowledge. 15:29:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 21                                                                                                                       | assert that privilege now, too.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 21                                                                                                                             | Q. What about Allyn W. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 22                                                                                                                       | Q. Okay. Have you talked to Lisa Hawk                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 22                                                                                                                             | A. I'm also unsure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 23                                                                                                                       | about what happened on November 11th?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 23                                                                                                                             | (Whereupon, Ms. Crocker entered the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 24                                                                                                                       | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 24                                                                                                                             | conference room.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 25                                                                                                                       | Same instruction not to answer. 15:24:31                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 25                                                                                                                             | Q. Okay. Allyn D. Gibson? 15:29:34                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                                          | Page 191                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | l                                                                                                                              | Page 193                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | İ                                                                                                                              | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 1                                                                                                                        | Q. So what else did you personally observe                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                                                                                                                              | A. I'm also unsure about that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1<br>2                                                                                                                   | Q. So what else did you personally observe on November 10th that you have not previously                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2                                                                                                                              | A. I'm also unsure about that.     Q. How close do you live to the bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                          | Q. So what else did you personally observe on November 10th that you have not previously described?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3                                                                                                                         | <ul><li>A. I'm also unsure about that.</li><li>Q. How close do you live to the bakery?</li><li>A. I live in Carlisle Township.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2<br>3<br>4                                                                                                              | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4                                                                                                                    | <ul><li>A. I'm also unsure about that.</li><li>Q. How close do you live to the bakery?</li><li>A. I live in Carlisle Township.</li><li>Q. About how far away is that from the</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5                                                                                                         | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that  15:24:47                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5                                                                                                               | <ul> <li>A. I'm also unsure about that.</li> <li>Q. How close do you live to the bakery?</li> <li>A. I live in Carlisle Township.</li> <li>Q. About how far away is that from the bakery?</li> <li>15:29:59</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6                                                                                                    | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6                                                                                                          | <ul> <li>A. I'm also unsure about that.</li> <li>Q. How close do you live to the bakery?</li> <li>A. I live in Carlisle Township.</li> <li>Q. About how far away is that from the bakery?</li> <li>A. Ten or so miles.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                               | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | <ul> <li>A. I'm also unsure about that.</li> <li>Q. How close do you live to the bakery?</li> <li>A. I live in Carlisle Township.</li> <li>Q. About how far away is that from the bakery?</li> <li>A. Ten or so miles.</li> <li>Q. When the Tribune covers a story, does it</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | <ul> <li>A. I'm also unsure about that.</li> <li>Q. How close do you live to the bakery?</li> <li>A. I live in Carlisle Township.</li> <li>Q. About how far away is that from the bakery? <ul> <li>15:29:59</li> </ul> </li> <li>A. Ten or so miles.</li> <li>Q. When the Tribune covers a story, does it do so at least in part because it believes that</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | <ul> <li>A. I'm also unsure about that.</li> <li>Q. How close do you live to the bakery?</li> <li>A. I live in Carlisle Township.</li> <li>Q. About how far away is that from the bakery? <ul> <li>15:29:59</li> </ul> </li> <li>A. Ten or so miles.</li> <li>Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the 15:24:59                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                           | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because 15:30:30                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?                                                                                                                                                                                                                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind,                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that.                                                                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it 15:30:39                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that.                                                                                                                                                                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it do so at least in part because it believes the                                                                                                                                                                                                                                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you stayed at the demonstration on November 10?                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it do so at least in part because it believes the matter is something the public has some interest                                                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it do so at least in part because it believes the matter is something the public has some interest in?                                                                                                                                                                                                   |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you stayed at the demonstration on November 10?  A. It was probably in the neighborhood of 90 to 120 minutes. 15:25:29                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                               | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it do so at least in part because it believes the matter is something the public has some interest in? MR. KESLAR: Same objection.                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you stayed at the demonstration on November 10?  A. It was probably in the neighborhood of                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it 15:30:39 do so at least in part because it believes the matter is something the public has some interest in? MR. KESLAR: Same objection. I'm going to instruct you again not to 15:30:50 answer. Q. You've been an editor with the Tribune                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you stayed at the demonstration on November 10?  A. It was probably in the neighborhood of 90 to 120 minutes. 15:25:29  Q. Why did you decide to leave?                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it 15:30:39 do so at least in part because it believes the matter is something the public has some interest in? MR. KESLAR: Same objection. I'm going to instruct you again not to 15:30:50 answer. Q. You've been an editor with the Tribune for how many years?                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you stayed at the demonstration on November 10?  A. It was probably in the neighborhood of 90 to 120 minutes. 15:25:29  Q. Why did you decide to leave?  A. It had become repetitious.                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it 15:30:39 do so at least in part because it believes the matter is something the public has some interest in? MR. KESLAR: Same objection. I'm going to instruct you again not to 15:30:50 answer. Q. You've been an editor with the Tribune for how many years? A. When was it? I'd have to look at my |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q. So what else did you personally observe on November 10th that you have not previously described?  MR. KESLAR: I'm going to object just because the question as stated is so broad that it would require him to disclose privileged information, and therefore, cannot be cannot be responded to without waiving his privilege, which I'm instructing him not to do.  Q. For how long were you present at the demonstration on November 10?  A. I don't have a definitive length of time to give you.  THE REPORTER: I'm sorry?  A. I don't have a definitive length of time 15:25:09 to give you.  Q. Can you estimate for us how long you stayed at the demonstration on November 10?  A. It was probably in the neighborhood of 90 to 120 minutes.  15:25:29  Q. Why did you decide to leave?  A. It had become repetitious.  MR. HOLMAN: We're going to stop and | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. I'm also unsure about that. Q. How close do you live to the bakery? A. I live in Carlisle Township. Q. About how far away is that from the bakery? 15:29:59 A. Ten or so miles. Q. When the Tribune covers a story, does it do so at least in part because it believes that that story is a matter of interest to the public? MR. KESLAR: I'm going to object because it goes to the editorial process, state of mind, his First Amendment privilege. So I'm going to instruct you not to answer that. Q. When the Tribune covers a story, does it 15:30:39 do so at least in part because it believes the matter is something the public has some interest in? MR. KESLAR: Same objection. I'm going to instruct you again not to 15:30:50 answer. Q. You've been an editor with the Tribune for how many years?                                        |

|                | Page 194                                                                                      |          | Page 196                                                                                        |
|----------------|-----------------------------------------------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------|
| 1              | Q. Okay. Do you like your position?                                                           | 1        | A. It appears to be an e-mail between                                                           |
| 2              | A. I do. Very much.                                                                           | 2        | myself and someone named Clyde Owan claiming to                                                 |
| 3              | Q. What do you like about being an editor?                                                    | 3        | be an Oberlin College graduate.                                                                 |
| 4              | MR. KESLAR: We're going to assert                                                             | 4        | Q. Okay. Have you seen the e-mails that                                                         |
| 5              | privilege based on it's really calling for state 15:31:26                                     | 5        | make up this exhibit before? 15:36:26                                                           |
| 6              | of mind, it really has nothing to do with any of                                              | 6        | A. Yes.                                                                                         |
| 7              | the issues we're here about, and it goes directly                                             | 7        | Q. Okay. Prior to November 11, 2016, had                                                        |
| 8              | to his state of mind as an editor for the Oberlin                                             | 8        | you had any communication with Clyde Owan, which                                                |
| 9              | News Tribune. So to the extent that it invades                                                | 9        | is O-W-A-N? MR, KESLAR; Excuse me. Can you 15:36:41                                             |
| 10             | on his First Amendment privilege regarding the 15:31:41                                       | 10       | · · · · · · · · · · · · · · · · · · ·                                                           |
| 11             | editorial process, I'm going to instruct him not                                              | 11<br>12 | repeat – can you repeat that question? I missed the date that you said.                         |
| 12<br>13       | to answer.                                                                                    | 13       | Q. November 11. So I'll repeat the                                                              |
| 14             | Q. Do you believe that newspapers have an important purpose?                                  | 14       | question, yeah.                                                                                 |
| 15             | MR. KESLAR: Same objection. Goes right 15:31:52                                               | 15       | So, Mr. Hawk, prior to November 11, 15:36:50                                                    |
| 16             | to the editorial process. First Amendment                                                     | 16       | 2016, had you exchanged e-mails with Mr. Clyde                                                  |
| 17             | privilege.                                                                                    | 17       | Owan?                                                                                           |
| 18             | I instruct you not to answer.                                                                 | 18       | A. I don't recall ever doing so.                                                                |
| 19             | Q. Do you care whether anybody reads the                                                      | 19       | Q. Do you know Clyde Owan?                                                                      |
| 20             | paper? 15:32:08                                                                               | 20       | A. No. 15:37:13                                                                                 |
| 21             | MR. KESLAR: Objection. Same objection.                                                        | 21       | Q. Do you know whether he's an alumnus of                                                       |
| 22             | Instruct you not to answer that.                                                              | 22       | Oberlin College?                                                                                |
| 23             | Q. Have you ever received any e-mails                                                         | 23       | A. Only that he claims to be.                                                                   |
| 24             | either about the demonstrations that took place                                               | 24       | <ul> <li>Q. Okay. Do you know anything else about</li> </ul>                                    |
| 25             | outside Gibson's Bakery or the shoplifting 15:32:25                                           | 25       | him, whether it's claimed or factual? 15:37:30                                                  |
|                | Molnar Reporting Services, LLC (440) 340-6161                                                 |          | Molnar Reporting Services, LLC (440) 340-6161                                                   |
|                | Page 195                                                                                      |          | Page 197                                                                                        |
| 1              | incident at Gibson's Bakery?                                                                  | 1        | A. No.                                                                                          |
| 2              | MR. KESLAR: Objection, because it calls                                                       | 2        | Q. So he writes you an e-mail that purports                                                     |
| 3              | for undisclosed sources and it calls for                                                      | 3        | to be from one of your news articles; is that                                                   |
| 4              | information you might have gathered but not                                                   | 4        | correct?                                                                                        |
| 5              | during your reporting process but not disclosed. 15:32:39                                     | 5        | A. Yes. 15:37:53                                                                                |
| 6              | And so I'm going to instruct you not to                                                       | 6        | Q. Okay. And at the bottom of Exhibit 4,                                                        |
| 7              | answer that question.                                                                         | 7        | did he accurately repeat what appears in one of                                                 |
| 8              | Q. Have you received any letters either                                                       | 8        | your news articles?                                                                             |
| 9              | about the shoplifting incident or the                                                         | 9        | A. It appears so, but I can't tell for sure                                                     |
| 10             | demonstrations that took place outside the 15:32:52                                           | 10       | without comparing them side by side. 15:38:22                                                   |
| 11             | bakery?                                                                                       | 11       | Q. Okay. So the next paragraph has a                                                            |
| 12             | MR. KESLAR: Same objection.                                                                   | 12       | series of questions for you, right?                                                             |
| 13             | Same instruction not to answer.                                                               | 13<br>14 | A. Yes.                                                                                         |
| 14             | MR. HOLMAN: Thank you. Do you have the other one? Thank you. You read my mind. Thank 15:33:25 | 15       | Q. Okay. And I'm not going to bother to read that into the record, but it appears that 15:38:38 |
| 15<br>16       | •                                                                                             | 16       | you responded to his e-mail, correct?                                                           |
| 17             | you.  Q. I'm going to show you we're going to                                                 | 17       | A. Yes.                                                                                         |
| 18             | mark this Number 4. Thank you. Exhibit                                                        | 18       | Q. And, in fact, it looks like you                                                              |
| 19             | Number 4.                                                                                     | 19       | responded quickly to his e-mail, correct?                                                       |
| 20             | 15:34:14                                                                                      | 20       | A. The next morning, yes. 15:38:55                                                              |
|                |                                                                                               | 21       | Q. Actually, it looks like the same day.                                                        |
|                | (Thereupon, Hawk Deposition Exhibit 4 was marked                                              |          |                                                                                                 |
| 21<br>22       | (Thereupon, Hawk Deposition Exhibit 4 was marked for purposes of identification.)             | 22       | It appears to me that Mr. Owan wrote you an                                                     |
| 21             | for purposes of identification.)                                                              | 22<br>23 | It appears to me that Mr. Owan wrote you an e-mail at 9:02 in the morning, and according to     |
| 21<br>22       |                                                                                               | L        |                                                                                                 |
| 21<br>22<br>23 | for purposes of identification.)                                                              | 23       | e-mail at 9:02 in the morning, and according to                                                 |

| Dago 109                                                      | Page 200                                                     |
|---------------------------------------------------------------|--------------------------------------------------------------|
| Page 198                                                      |                                                              |
| 1 correct?                                                    | 1 Q. Yeah. What did you mean by the phrase                   |
| 2 A. You're correct. I'm sorry. I misread                     | 2 "stood with them authoritatively"?                         |
| 3 the time stamp as 2:33 a.m.                                 | 3 MR, KESLAR: Again, it goes to your                         |
| 4 Q. Okay. So you responded quickly to his                    | 4 state of mind as an editor of the newspaper.               |
| 5 e-mail, correct? 15:39:30                                   | 5 It's protected by the First Amendment privilege, 15:41:27  |
| 6 A. Yes.                                                     | 6 and so I'm going to instruct you not to answer.            |
| 7 Q. Why did you respond to his e-mail?                       | 7 Q. Your e-mail goes on to say that she was,                |
| 8 MR. KESLAR: Objection. That goes to                         | 8 quote, "Advocating for them directly by                    |
| 9 your state of mind as an editor. It's protected             | 9 attempting to convince media and passersby not to          |
| by the First Amendment. You don't have to answer 15:39:41     | 10 take photographs of the demonstration, which was 15:41:43 |
| 11 that question.                                             | 11 held in public."                                          |
| 12 Q. Was this the first comment you've ever                  | 12 Did I read that correctly?                                |
| 13 received from someone who has read your articles?          | 13 A. Yes. There's no quotation mark, but                    |
| 14 MR. KESLAR: Objection. It's overly                         | 14 yes.                                                      |
| 15 broad and therefore invades the editorial process 15:39:52 | 15 Q. Right. And the quotation mark just 15:41:59            |
| 16 and your First Amendment privilege.                        | 16 refers to the point for the benefit of the court          |
| 17 I'm going to instruct you not to answer                    | 17 reporter and future readers of this transcript            |
| 18 that question.                                             | 18 that we are actually quoting from your e-mail,            |
| 19 Q. So the middle of the page contains an                   | 19 okay?                                                     |
| 20 e-mail from you to Mr. Owan, correct? 15:40:03             | 20 A. Thank you. 15:42:09                                    |
| 21 A. Yes.                                                    | Q. Why did you write that sentence?                          |
| 22 Q. And you identified yourself as Jason                    | 22 MR. KESLAR: Same objection as before.                     |
| 23 Hawk, editor of the Lorain County Community                | 23 I'm going to instruct you not to answer.                  |
| 24 Newspapers, correct?                                       | Q. Why did you use the phrase "advocating                    |
| 25 A. Yes. 15:40:15                                           | 25 for them"? 15:42:20                                       |
| Molnar Reporting Services, LLC (440) 340-6161                 | Molnar Reporting Services, LLC (440) 340-6161                |
| Page 199                                                      | Page 201                                                     |
| 1 Q. And you also further indicate that                       | 1 MR. KESLAR; Again, goes right to the                       |
| 2 you're associated with Civitas Media, right?                | 2 editorial process, your state of mind, and it's            |
| 3 A. Correct.                                                 | 3 protected by the First Amendment privilege, so             |
| 4 Q. So your e-mail response starts with,                     | 4 I'm instructing you not to answer.                         |
| 5 "The dean stood physically with the protestors." 15:40:27   | 5 Q. You've testified at length that 15:42:29                |
| 6 Do you see that?                                            | 6 Dr. Raimondo blocked you on two occasions from             |
| 7 A. I see that.                                              | 7 taking photographs, correct?                               |
| 8 Q. Does that sentence refer to                              | 8 A. Yes.                                                    |
| 9 Dr. Raimondo?                                               | 9 Q. Did you personally observe Dr. Raimondo                 |
| 10 A, Yes. 15:40:36                                           | attempt to block other members of the media from 15:42:44    |
| 11 Q. Why did you write that sentence?                        | taking photographs at the demonstration on                   |
| 12 MR, KESLAR: Objection. Editorial                           | 12 November 10, 2016?                                        |
| 13 privilege.                                                 | 13 A, No.                                                    |
| 14 You don't have to respond to that.                         | 14 Q. Did you personally observe Dr. Raimondo                |
| 15 Q. Can you explain what you meant by the 15:40:47          | attempt to stop passersby from photographing the 15:43:01    |
| 16 sentence, "The dean stood physically with the              | demonstrators on November 10, 2016?                          |
| 17 protestors"?                                               | 17 A. Yes.                                                   |
| 18 MR, KESLAR: Same objection. Calls for                      | 18 Q. Okay. Describe for me what you                         |
| 19 your state of mind, and so I'm going to instruct           | 19 personally observed.                                      |
| 20 you not to answer. 15:41:02                                | A. I saw her approach people and ask them 15:43:21           |
| 21 Q. Let's move on to the next paragraph,                    | 21 to put their cameras away and say that they               |
| 22 which says in part, "She also stood with them              | 22 couldn't take pictures.                                   |
| 23 authoritatively."                                          | 23 Q. So you saw her approach people, correct?               |
| 24 Do you see that?                                           | 24 A. Correct.                                               |
| 25 A. I see it. 15:41:15                                      | 25 Q. How many people? 15:43:34                              |
| Molnar Reporting Services, LLC (440) 340-6161                 | Molnar Reporting Services, LLC (440) 340-6161                |
| Troiling Teleporting Services, ESC (440) 5 to 0101            |                                                              |

|                                                                                                                          | Page 202                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                          | Page 204                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                        | A. I recall two instances.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 1                                                                                                                        | Q. Okay. What exactly did Dr. Raimondo say                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2                                                                                                                        | Q. Can you describe the first instance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2                                                                                                                        | to this person?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3                                                                                                                        | to – for me?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 3                                                                                                                        | MR. KESLAR: Objection. Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4                                                                                                                        | A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4                                                                                                                        | that you might have encountered during the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5                                                                                                                        | Q. Do you remember the first instance? 15:43:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                                        | news-gathering process not disclosed in your 15:45:46                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 6                                                                                                                        | A. She approached people and she asked them                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 6                                                                                                                        | articles, and so it's protected by the First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 7                                                                                                                        | to put their cameras away.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 7                                                                                                                        | Amendment, so I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 8                                                                                                                        | Q. Okay.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 8                                                                                                                        | answer that question.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 9                                                                                                                        | A. And told them that they didn't have the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 9                                                                                                                        | Q. So you've testified that you personally                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10                                                                                                                       | right to take pictures of the protest. (15:43:59)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 10                                                                                                                       | observed Dr. Raimondo on two occasions 15:45:56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 11                                                                                                                       | Q. So that was the first incident?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 11                                                                                                                       | approaching individuals asking them not to take                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12                                                                                                                       | A. It happened in the second incident as                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 12                                                                                                                       | photographs, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 13                                                                                                                       | well.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 13                                                                                                                       | A. That's correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 14                                                                                                                       | Q. Okay. Let's talk about just the first                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 14                                                                                                                       | Q. Did you personally hear what Dr. Raimondo said to the first protestor?  15:46:09                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 15                                                                                                                       | incident. About what time did the first incident 15:44:08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 15<br>16                                                                                                                 | Dr. Raimondo said to the first protestor? (15:46:09)  (A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 16<br>17                                                                                                                 | take place? A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 17                                                                                                                       | Q. Okay. What did she say?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 17<br>18                                                                                                                 | Q. Did it take place shortly after you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 18                                                                                                                       | MR. KESLAR: I've got to stop you. The                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 19                                                                                                                       | arrived at the demonstration on November 10?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 19                                                                                                                       | first protestor? I'm not sure I'm following.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 20                                                                                                                       | A. I don't know. 15:44:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 20                                                                                                                       | Q. Okay. So we're talking about two 15:46:24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 21                                                                                                                       | Q. Okay. About how far away were you from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 21                                                                                                                       | incidents, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 22                                                                                                                       | Dr. Raimondo when you personally observed her                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 22                                                                                                                       | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 23                                                                                                                       | approaching someone the first time?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 23                                                                                                                       | Q. And was the person taking pictures in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 24                                                                                                                       | A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 24                                                                                                                       | the first incident a protestor?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 25                                                                                                                       | Q. Okay. You have no recollection 15:44:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 25                                                                                                                       | A. No. I missed that as well. I'm sorry. 15:46:33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                          | Page 203                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                          | Page 205                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 1                                                                                                                        | Page 203 whatsoever?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 1                                                                                                                        | Page 205  Q. Okay. That's fine. So let's go back.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 1<br>2                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1 2                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|                                                                                                                          | whatsoever?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1                                                                                                                        | Q. Okay. That's fine. So let's go back.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2                                                                                                                        | whatsoever? A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2                                                                                                                        | Q. Okay. That's fine. So let's go back.<br>So you personally observed Dr. Raimondo<br>approaching an individual who was taking<br>pictures, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2<br>3                                                                                                                   | whatsoever?  A. No.  Q. Okay. Who was the person that she                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2 3                                                                                                                      | <ul> <li>Q. Okay. That's fine. So let's go back.</li> <li>So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                               |
| 2<br>3<br>4                                                                                                              | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that.  Q. Was the person a man?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6                                                                                                    | <ul> <li>Q. Okay. That's fine. So let's go back.</li> <li>So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that</li> </ul>                                                                                                                                                                                                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                               | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that.  Q. Was the person a man?  A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7                                                                                               | <ul> <li>Q. Okay. That's fine. So let's go back.</li> <li>So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that person was taking pictures?</li> </ul>                                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6                                                                                                    | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman?                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>Q. Okay. That's fine. So let's go back.</li> <li>So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that person was taking pictures?</li> <li>A. No.</li> </ul>                                                                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that person was taking pictures?</li> <li>A. No.</li> <li>Q. Do you know if that person was a</li> </ul>                                                                                                                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | whatsoever?  A. No. Q. Okay. Who was the person that she approached? A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that person was taking pictures?</li> <li>A. No.</li> <li>Q. Do you know if that person was a student? 15:46:51</li> </ul>                                                                                                                                                                                                                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached?                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that person was taking pictures?</li> <li>A. No.</li> <li>Q. Do you know if that person was a student? 15:46:51</li> <li>A. No.</li> </ul>                                                                                                                                                                                                                        |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No.                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member?</li> </ul>                                                                                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No. Q. What was the person's race?                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member? A. No.</li> </ul>                                                                                                                                                                                                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know.                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?</li> <li>A. Yes. 15:46:47</li> <li>Q. Do you have any knowledge as to why that person was taking pictures?</li> <li>A. No.</li> <li>Q. Do you know if that person was a student? 15:46:51</li> <li>A. No.</li> <li>Q. Faculty member?</li> <li>A. No.</li> <li>Q. Administrator?</li> </ul>                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? 15:45:05                                                                                                                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58</li> </ul>                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. D. Was the person a man?  A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? Dr. Raimondo approached?  A. I don't know. D. What was the person's race? A. I don't know. D. Height? Dr. Raimondo approached? Dr. Raimondo approached?  A. I don't know. D. Height? Dr. Raimondo approached?  A. I don't know.                                                                     | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College?</li> </ul>                                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? 15:45:05 A. I also don't know. Q. Can you describe the person's clothing                                                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College? A. No.</li> </ul>                                                                                                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? 15:45:05 A. I also don't know. Q. Can you describe the person's clothing in any way?                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College? A. No. Q. A member of the public at large?</li> </ul>                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. 15:44:39 Q. Was the person a man? A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that 15:44:52 Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? 15:45:05 A. I also don't know. Q. Can you describe the person's clothing in any way? A. No.                                                                                                                                                                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | <ul> <li>Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47  Q. Do you have any knowledge as to why that person was taking pictures?  A. No. Q. Do you know if that person was a student? 15:46:51  A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College? A. No. Q. A member of the public at large? A. No.</li> </ul>                                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. Q. Was the person a man?  A. I don't know. Q. Was the person a woman?  A. I don't know. Q. Can you describe the person that Q. Can you describe the person that Dr. Raimondo approached?  A. No. Q. What was the person's race? A. I don't know. Q. Height?  15:45:05  A. I also don't know. Q. Can you describe the person's clothing in any way?  A. No. Q. Can you identify the camera that the 15:45:14                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47 Q. Do you have any knowledge as to why that person was taking pictures? A. No. Q. Do you know if that person was a student? 15:46:51 A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College? A. No. Q. A member of the public at large? A. No. Q. So what exactly did Dr. Raimondo say to 15:47:08                                                                                  |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. Q. Was the person a man?  A. I don't know. Q. Was the person a woman?  A. I don't know. Q. Can you describe the person that Q. What was the person's race?  A. No. Q. What was the person's race?  A. I don't know. Q. Height?  I 15:45:05  A. I also don't know. Q. Can you describe the person's clothing in any way?  A. No. Q. Can you identify the camera that the person was using?                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47 Q. Do you have any knowledge as to why that person was taking pictures? A. No. Q. Do you know if that person was a student? 15:46:51 A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College? A. No. Q. A member of the public at large? A. No. Q. So what exactly did Dr. Raimondo say to that individual?                                                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. Q. Was the person a man?  A. I don't know. Q. Was the person a woman?  A. I don't know. Q. Can you describe the person that Q. Can you describe the person that Dr. Raimondo approached?  A. No. Q. What was the person's race? A. I don't know. Q. Height?  I 5:45:05  A. I also don't know. Q. Can you describe the person's clothing in any way?  A. No. Q. Can you identify the camera that the person was using?  A. No.                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47 Q. Do you have any knowledge as to why that person was taking pictures? A. No. Q. Do you know if that person was a student? 15:46:51 A. No. Q. Faculty member? A. No. Q. Administrator? A. No. 15:46:58 Q. Staff member at Oberlin College? A. No. Q. A member of the public at large? A. No. Q. So what exactly did Dr. Raimondo say to that individual? MR. KESLAR: Again, I'm going to                                          |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. D. Was the person a man?  A. I don't know. Q. Was the person a woman? A. I don't know. Q. Can you describe the person that Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? Dr. Raimondo approached? A. No. Q. What was the person's race? A. I don't know. Q. Height? Dr. Raimondo approached? A. I also don't know. Q. Can you describe the person's clothing in any way? A. No. Q. Can you identify the camera that the Dr. Raimondo Did you personally observe Dr. Raimondo | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47 Q. Do you have any knowledge as to why that person was taking pictures? A. No. Q. Do you know if that person was a student? 15:46:51 A. No. Q. Faculty member? A. No. Q. Administrator? A. No. Q. Staff member at Oberlin College? A. No. Q. A member of the public at large? A. No. Q. So what exactly did Dr. Raimondo say to that individual? MR. KESLAR: Again, I'm going to instruct you not to answer that question based on |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | whatsoever?  A. No. Q. Okay. Who was the person that she approached?  A. I have no way of knowing that. Q. Was the person a man?  A. I don't know. Q. Was the person a woman?  A. I don't know. Q. Can you describe the person that Q. Can you describe the person that Dr. Raimondo approached?  A. No. Q. What was the person's race? A. I don't know. Q. Height?  I 5:45:05  A. I also don't know. Q. Can you describe the person's clothing in any way?  A. No. Q. Can you identify the camera that the person was using?  A. No.                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q. Okay. That's fine. So let's go back. So you personally observed Dr. Raimondo approaching an individual who was taking pictures, correct?  A. Yes. 15:46:47 Q. Do you have any knowledge as to why that person was taking pictures? A. No. Q. Do you know if that person was a student? 15:46:51 A. No. Q. Faculty member? A. No. Q. Administrator? A. No. Q. Administrator? A. No. Q. Staff member at Oberlin College? A. No. Q. A member of the public at large? A. No. Q. So what exactly did Dr. Raimondo say to that individual? MR. KESLAR: Again, I'm going to                          |

|                                                                                                                          | D 006                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <u> </u>                                                                                                                 | D 200                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                          | Page 206                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                          | Page 208                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1                                                                                                                        | Dr. Raimondo on two occasions tell people to stop                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1                                                                                                                        | Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2                                                                                                                        | taking pictures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2                                                                                                                        | Q. So as you stood and observed the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 3                                                                                                                        | Can you tell me specifically what word                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3                                                                                                                        | protests on November 10th, you personally                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4                                                                                                                        | she used to communicate that message?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 4                                                                                                                        | observed two instances when Dr. Raimondo asked                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5                                                                                                                        | MR. KESLAR: I'm going to instruct you 15:47:33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 5                                                                                                                        | people to stop taking pictures, correct? (15:49:51)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 6                                                                                                                        | not to answer that question based on your First                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 6<br>7                                                                                                                   | A. Yes. Q. And just two instances?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| ′                                                                                                                        | Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 8                                                                                                                        | <ul><li>Q. (And just two instances?</li><li>A. (I don't recall further instances.)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 8<br>9                                                                                                                   | Q. Okay. So let's go to the second incident. About what time did that incident take                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9                                                                                                                        | Q. Okay. Your e-mail to Mr. Owan says,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10                                                                                                                       | place? And again, we're referring to an instance 15:47:46                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 10                                                                                                                       | "While I do not know her stance on the Gibson's 15:50:08                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 11                                                                                                                       | where you saw Dr. Raimondo approach an individual                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 11                                                                                                                       | issue."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 12                                                                                                                       | and indicate that they should not photograph the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 12                                                                                                                       | Why did you write that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 13                                                                                                                       | demonstrations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 13                                                                                                                       | MR. KESLAR: Objection. Goes to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 14                                                                                                                       | A. I don't know.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 14                                                                                                                       | editorial process, state of mind, First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 15                                                                                                                       | Q. Okay. About how far away were you from 15:48:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 15                                                                                                                       | privilege. 15:50:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 16                                                                                                                       | Dr. Raimondo when you observed this?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 16                                                                                                                       | I'm going to instruct you not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 17                                                                                                                       | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 17                                                                                                                       | Q. You also write, "She was more than a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 18                                                                                                                       | Q. Who was this individual?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 18                                                                                                                       | passive observer."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 19                                                                                                                       | A. I have no way of knowing that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 19                                                                                                                       | Why did you write that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 20                                                                                                                       | Q. Was it a man? 15:48:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 20                                                                                                                       | MR. KESLAR: Same objection. 15:50:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 21                                                                                                                       | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 21                                                                                                                       | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 22                                                                                                                       | Q. A woman?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 22                                                                                                                       | Q. That same sentence goes on, and I'll                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 23                                                                                                                       | A. I also don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 23                                                                                                                       | quote, "Positioning herself with students both                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 24                                                                                                                       | Q. Was the person black?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 24                                                                                                                       | physically and authoritatively when confronting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 25                                                                                                                       | A. I have no idea. 15:48:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 25                                                                                                                       | me (very nicely, but still shoulder-to-shoulder 15:50:41                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                          | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                          | Page 207                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                          | Page 209                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1                                                                                                                        | Page 207<br>Q. White?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                                                                                                                        | Page 209 with protestors) over my use of a camera in the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 1<br>2                                                                                                                   | Q. White?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1 2                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                          | Q. White?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1                                                                                                                        | with protestors) over my use of a camera in the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2                                                                                                                        | Q. White? A. Again, I have no idea.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 2                                                                                                                        | with protestors) over my use of a camera in the public right-of-way."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3                                                                                                                   | <ul><li>Q. White?</li><li>A. Again, I have no idea.</li><li>Q. Some other race?</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5                                                                                                         | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  15:50:56                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2<br>3<br>4                                                                                                              | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3<br>4<br>5<br>6                                                                                                    | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7                                                                                               | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6                                                                                                    | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  MR. KESLAR: Same objection.  Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or</li> </ul>                                                                                                                                                                                                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  MR. KESLAR: Same objection.  Same instruction not to answer.  Q. The next paragraph reads, "Later,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> </ul>                                                                                                                                                                                                                                                                                                       | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                          | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  MR. KESLAR: Same objection.  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes. 15:48:48</li> </ul>                                                                                                                                                                                                                                                                             | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan? 15:50:56  MR. KESLAR: Same objection.  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly? 15:51:10                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes. 15:48:48</li> <li>Q. What kind of camera?</li> </ul>                                                                                                                                                                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan? 15:50:56  MR. KESLAR: Same objection.  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly? 15:51:10  A. That's part of the sentence, yes.                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes.</li> <li>Q. What kind of camera?</li> <li>A. I really don't know.</li> </ul>                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan? 15:50:56  MR. KESLAR: Same objection.  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly? 15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did                                                                                                                                                                                                                                                                                                                                                                 |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                   | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes.</li> <li>Q. What kind of camera?</li> <li>A. I really don't know.</li> <li>Q. How far did Dr. Raimondo walk in order</li> </ul>                                                                                                                                                                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?                                                                                                                                                                                                                                                                                                                                                                    |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes. 15:48:48</li> <li>Q. What kind of camera?</li> <li>A. I really don't know.</li> <li>Q. How far did Dr. Raimondo walk in order to approach this person?</li> </ul>                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.                                                                                                                                                                                                                                                                                                                                                |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes. 15:48:48</li> <li>Q. What kind of camera?</li> <li>A. I really don't know.</li> <li>Q. How far did Dr. Raimondo walk in order to approach this person?</li> <li>A. I don't know. 15:49:01</li> </ul>                                                                                            | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26                                                                                                                                                                                                                                                                                           |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What – strike that.                                                                                                                                                                                      | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | <ul> <li>Q. White?</li> <li>A. Again, I have no idea.</li> <li>Q. Some other race?</li> <li>A. I have no way to tell.</li> <li>Q. What was the approximate age of the person that Dr. Raimondo approached?</li> <li>A. I don't know.</li> <li>Q. Did the person have a camera on his or her person?</li> <li>A. Yes. 15:48:48</li> <li>Q. What kind of camera?</li> <li>A. I really don't know.</li> <li>Q. How far did Dr. Raimondo walk in order to approach this person?</li> <li>A. I don't know. 15:49:01</li> <li>Q. Okay. What - strike that. What exactly did Dr. Raimondo say to</li> </ul>                 | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.                                                                                                                                                                                                                         |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What – strike that. What exactly did Dr. Raimondo say to this second individual?                                                                                                                         | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer                                                                                                                                                                              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What – strike that. What exactly did Dr. Raimondo say to this second individual? A. I don't recall her exact wording.                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19                         | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer to your arrival or closure to your departure from                                                                                                                            |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What – strike that. What exactly did Dr. Raimondo say to this second individual? A. I don't recall her exact wording. Q. Okay. Do you recall her general 15:49:21                                        | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer to your arrival or closure to your departure from the demonstration?  15:51:51                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What — strike that. What exactly did Dr. Raimondo say to this second individual? A. I don't recall her exact wording. Q. Okay. Do you recall her general 15:49:21 wording?                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer to your arrival or closure to your departure from the demonstration?  15:51:51  A. I would say closer to my departure.                                                       |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What — strike that. What exactly did Dr. Raimondo say to this second individual? A. I don't recall her exact wording. Q. Okay. Do you recall her general 15:49:21 wording? A. Yes.                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer to your arrival or closure to your departure from the demonstration?  15:51:51                                                                                               |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What — strike that. What exactly did Dr. Raimondo say to this second individual? A. I don't recall her exact wording. Q. Okay. Do you recall her general 15:49:21 wording? A. Yes. Q. Okay. What was it? | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was 15:51:26 it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer to your arrival or closure to your departure from the demonstration?  15:51:51  A. I would say closer to my departure.  Q. Okay. Was your colleague with you at              |
| 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | Q. White? A. Again, I have no idea. Q. Some other race? A. I have no way to tell. Q. What was the approximate age of the person that Dr. Raimondo approached? A. I don't know. Q. Did the person have a camera on his or her person? A. Yes. 15:48:48 Q. What kind of camera? A. I really don't know. Q. How far did Dr. Raimondo walk in order to approach this person? A. I don't know. 15:49:01 Q. Okay. What — strike that. What exactly did Dr. Raimondo say to this second individual? A. I don't recall her exact wording. Q. Okay. Do you recall her general 15:49:21 wording? A. Yes.                       | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | with protestors) over my use of a camera in the public right-of-way."  Did I read that correctly?  A. Yes.  Q. Why did you write that to Mr. Owan?  Same instruction not to answer.  Q. The next paragraph reads, "Later, organizers pointed to her."  Did I read that correctly?  15:51:10  A. That's part of the sentence, yes.  Q. During what part of the day did organizers point to Dr. Raimondo?  A. I don't recall.  Q. Was it shortly after you arrived or was  15:51:26  it later in the day?  A. It was within the span that I was there.  Q. Okay. Did that event take place closer to your arrival or closure to your departure from the demonstration?  15:51:51  A. I would say closer to my departure.  Q. Okay. Was your colleague with you at that time? |

|                                                                                                  | Page 210                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                            | Page 212                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                | "organizers," again, using the word that you use                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 1                                                                                                          | him not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2                                                                                                | here?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 2                                                                                                          | Q. Do you stand by this statement today?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3                                                                                                | A. I didn't know any of them.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 3                                                                                                          | MR, KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4                                                                                                | Q. Okay. When you left, did you know the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4                                                                                                          | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 5                                                                                                | identity of any of the organizers? 15:52:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 5                                                                                                          | Q. So the last paragraph reads, "She also 15:54:24                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 6                                                                                                | A. They did not give names.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 6                                                                                                          | stood logistically with students by facilitating                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 7                                                                                                | Q. Okay. This sentence also says that you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 7                                                                                                          | the protest, by which I mean she arranged                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8                                                                                                | used I'm sorry.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 8                                                                                                          | accommodations for them, including food, drinks,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 9                                                                                                | That the organizers, quote, "used a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 9                                                                                                          | and an inside rest area, and offering the above                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10                                                                                               | microphone to say the administration was present 15:52:30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 10                                                                                                         | to protestors through a megaphone provided by 15:54:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 11                                                                                               | to support the crowd."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 11                                                                                                         | organizers."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12                                                                                               | Is that what it says?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 12                                                                                                         | Do you see that?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 13                                                                                               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 13                                                                                                         | A. I see it.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 14                                                                                               | Q. Okay. Is this sentence accurate?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 14                                                                                                         | Q. Okay. Is that true?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 15                                                                                               | MR. KESLAR: Objection. Goes to the 15:52:43                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 15                                                                                                         | MR. KESLAR: Calls for his state of 15:54:53                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 16                                                                                               | state of mind. It also calls in for - yeah, it                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 16                                                                                                         | mind, and therefore, I'm going to instruct you                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 17                                                                                               | goes to his state of mind as an editor when                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 17                                                                                                         | not to answer that based on your First Amendment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 18                                                                                               | you're asking about the accuracy of information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 18                                                                                                         | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 19                                                                                               | delivered as an editor of the newspaper, and so                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 19                                                                                                         | Q. Did you personally observe Meredith                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 20                                                                                               | I'm going to assert the First Amendment 15:53:00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 20                                                                                                         | Raimondo using a megaphone on November 10? 15:55:06                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 21                                                                                               | privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 21                                                                                                         | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 22                                                                                               | Q. Did you write this e-mail by yourself?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 22                                                                                                         | Q. At what point in the day did you see                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 23                                                                                               | MR. KESLAR: That goes directly to the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 23                                                                                                         | this?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 24                                                                                               | editorial process, and therefore, I'm going to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 24                                                                                                         | A. I don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 25                                                                                               | instruct you not to answer that question. 15:53:10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 25                                                                                                         | Q. For how long did she have a megaphone? 15:55:28                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 20                                                                                               | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                            | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                                                                                  | Page 211                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                            | Page 213                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1                                                                                                | Q. Do you agree with all the statements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                                                                                                          | A. A brief time.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2                                                                                                | that are here in this e-mail?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 2                                                                                                          | <ul> <li>Q. Okay. When you talked to her – strike</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3                                                                                                | MR. KESLAR: That goes to his state of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 3                                                                                                          | that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 4                                                                                                | mind, so I'm going to instruct him not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 4                                                                                                          | You've testified regarding a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 5                                                                                                | Q. Is there anything in this e-mail that 15:53:22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6                                                                                                | •                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5                                                                                                          | conversation that you had with her at another 15:55:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                  | you now see that you now believe is inaccurate or                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 5<br>6                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 7                                                                                                | you now see that you now believe is inaccurate or warrants a correction?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                            | point during the day, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                  | warrants a correction?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6                                                                                                          | point during the day, correct?  A. Yes, sir.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| В                                                                                                | warrants a correction?  MR, KESLAR; Objection. Same basis.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 6<br>7                                                                                                     | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8<br>9                                                                                           | warrants a correction?  MR, KESLAR; Objection. Same basis.  First Amendment privilege.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6<br>7<br><b>8</b>                                                                                         | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 8<br>9<br>10                                                                                     | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer  15:53:34                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 6<br>7<br>8<br>9                                                                                           | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8<br>9<br>10<br>11                                                                               | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer  15:53:34  that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 6<br>7<br>8<br>9<br>10<br>11                                                                               | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone                                                                                                                                                                                                                                                                                                                                                                                                             |
| 8<br>9<br>10<br>11<br>12                                                                         | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer  15:53:34  that.  Q. When you responded to Mr. Owan on                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 6<br>7<br>8<br>9<br>10                                                                                     | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.                                                                                                                                                                                                                                                                                                                                                                                     |
| 8<br>9<br>10<br>11<br>12<br>13                                                                   | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer  15:53:34  that.  Q. When you responded to Mr. Owan on  November 11th, did you have any obligation to                                                                                                                                                                                                                                                                                                                                                                                                                                               | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?                                                                                                                                                                                                                                                                                                                                         |
| 8<br>9<br>10<br>11<br>12<br>13                                                                   | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?                                                                                                                                                                                                                                                                                                                                                                                                                              | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment                                                                                                                                                                                                                                                                                                 |
| 8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48                                                                                                                                                                                                                                                                                                                                                                                 | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13                                                                                                                                                                                                                                                                                      |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and                                                                                                                                                                                                                                                                                                                               | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer                                                                                                                                                                                                                                             |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to                                                                                                                                                                                                                                                                                   | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.                                                                                                                                                                                                                              |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment                                                                                                                                                                                                                                 | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a                                                                                                                                                                                        |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                           | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.                                                                                                                                                                                                                      | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?                                                                                                                                           |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.  Q. When you responded to Mr. Owan, do you 15:54:00                                                                                                                                                                  | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?  A. Yes, sir.  15:56:26                                                                                                                   |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.  Q. When you responded to Mr. Owan, do you believe that you were under an obligation of any                                                                                                                          | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?  A. Yes, sir.  15:56:26  Q. Okay. Do you recall what she said                                                                             |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.  Q. When you responded to Mr. Owan, do you believe that you were under an obligation of any kind to respond to his e-mail?                                                                                           | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?  A. Yes, sir.  15:56:26  Q. Okay. Do you recall what she said exactly using the megaphone?                                                |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.  Q. When you responded to Mr. Owan, do you 15:54:00 believe that you were under an obligation of any kind to respond to his e-mail?  MR. KESLAR: Again, that goes directly                                           | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?  A. Yes, sir.  15:56:26  Q. Okay. Do you recall what she said exactly using the megaphone?  A. No. I can't reconstruct her exact          |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.  Q. When you responded to Mr. Owan, do you 15:54:00 believe that you were under an obligation of any kind to respond to his e-mail?  MR. KESLAR: Again, that goes directly to his state of mind as an editor of this | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  15:55:58  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?  A. Yes, sir.  15:56:26  Q. Okay. Do you recall what she said exactly using the megaphone?  A. No. I can't reconstruct her exact wordage. |
| 8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | warrants a correction?  MR. KESLAR: Objection. Same basis.  First Amendment privilege.  I'm going to instruct you not to answer 15:53:34 that.  Q. When you responded to Mr. Owan on November 11th, did you have any obligation to send him an e-mail?  MR. KESLAR: That goes right to his 15:53:48 state of mind as an editor of this newspaper, and therefore, I'm going to instruct him not to answer that question based on his First Amendment privilege.  Q. When you responded to Mr. Owan, do you 15:54:00 believe that you were under an obligation of any kind to respond to his e-mail?  MR. KESLAR: Again, that goes directly                                           | 6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | point during the day, correct?  A. Yes, sir.  Q. When you observed Dr. Raimondo using the megaphone, was it before or after your conversation with her?  A. I observed her using the microphone after our conversation.  Q. What did Dr. Raimondo say specifically?  MR. KESLAR: Objection. First Amendment privilege.  15:56:13  I'm going to instruct you not to answer that question.  Q. So you heard Dr. Raimondo using a megaphone to say something, right?  A. Yes, sir.  15:56:26  Q. Okay. Do you recall what she said exactly using the megaphone?  A. No. I can't reconstruct her exact                    |

|                                                                                                                     | Page 214                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                | Page 216                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                                                                                                                   | using the megaphone?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 1                                                                                                                              | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2                                                                                                                   | A. She indicated to the crowd that I'm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2                                                                                                                              | Q. What about Allyn W. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 3                                                                                                                   | sorry. She indicated to the protestors that were                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 3                                                                                                                              | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 4                                                                                                                   | there that there was a space provided for them to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 4                                                                                                                              | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 5                                                                                                                   | rest and for food and for water, and that they 15:57:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 5                                                                                                                              | Q. Allyn D. Gibson? 15:59:18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6                                                                                                                   | could go there to anytime, at any time. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 6                                                                                                                              | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7                                                                                                                   | Q. Did she identify the space?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 7                                                                                                                              | Same obstruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 8                                                                                                                   | A. Yes, she did.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 8                                                                                                                              | Instruction. Excuse me.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 9                                                                                                                   | Q. Okay. What space was it?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 9                                                                                                                              | Q. When Dr. Raimondo was using the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10                                                                                                                  | A. I don't recall. 15:57:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 10                                                                                                                             | megaphone, did she tell the protestors that they 15:59:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 11                                                                                                                  | <ul> <li>Q. Did she identify with any specificity</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 11                                                                                                                             | should boycott Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12                                                                                                                  | what food was available?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 12                                                                                                                             | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 13                                                                                                                  | A. I also don't recall.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 13                                                                                                                             | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 14                                                                                                                  | <ul> <li>Q. Okay. Do you recall anything else that</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 14                                                                                                                             | Q. When Dr. Raimondo was using the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 15                                                                                                                  | Dr. Raimondo said when she was using the 15:57:44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 15                                                                                                                             | megaphone, did she encourage the crowd to use 15:59:37                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 16                                                                                                                  | megaphone?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 16                                                                                                                             | physical violence against David Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 17                                                                                                                  | MR. KESLAR: To the extent that it's not                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 17                                                                                                                             | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 18                                                                                                                  | previously been disclosed, I'm going to instruct                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 18                                                                                                                             | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 19                                                                                                                  | you not to answer that question based on your                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 19                                                                                                                             | Q. Allyn W. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 20                                                                                                                  | First Amendment privilege. 15:58:04                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 20                                                                                                                             | MR. KESLAR: Same objection. 15:59:48                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 21                                                                                                                  | Q. When Dr. Raimondo was using the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 21                                                                                                                             | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 22                                                                                                                  | megaphone, did she attack Gibson's Bakery?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 22                                                                                                                             | Q. Allyn D. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 23                                                                                                                  | MR. KESLAR: Same objection, and so I'm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 23                                                                                                                             | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 24                                                                                                                  | going to instruct you not to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 24                                                                                                                             | Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 25                                                                                                                  | Q. When she was using the megaphone, did 15:58:16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 25                                                                                                                             | Q. Did you call the police after hearing 15:59:54                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                                     | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                                                     | Page 215                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                | Page 217                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 1                                                                                                                   | 1.5.11.01/                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | i                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                     | she attack David Cibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 1                                                                                                                              | what Dr. Raimondo had to say?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 2                                                                                                                   | she attack David Gibson?  MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 1<br>2                                                                                                                         | what Dr. Raimondo had to say?  A. I don't believe that I called them in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2<br>3                                                                                                              | MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2<br>3<br>4                                                                                                         | MR. KESLAR: Same objection.  Same instruction not to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2                                                                                                                              | A. I don't believe that I called them in reference to our conversation, no.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3<br>4                                                                                                              | MR. KESLAR: Same objection.  Same instruction not to answer that.  Q. Allyn W. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 2 3                                                                                                                            | A. I don't believe that I called them in reference to our conversation, no.     Q. Okay. Well, my question is different.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 3                                                                                                                   | MR. KESLAR: Same objection.  Same instruction not to answer that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 2<br>3<br>4                                                                                                                    | A. I don't believe that I called them in reference to our conversation, no.     Q. Okay. Well, my question is different.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 3<br>4<br>5                                                                                                         | MR. KESLAR: Same objection. Same instruction not to answer that. Q. Allyn W. Gibson? MR. KESLAR: Same objection. 15:58:26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5                                                                                                               | <ul> <li>A. I don't believe that I called them in reference to our conversation, no.</li> <li>Q. Okay. Well, my question is different.</li> <li>When Dr. Raimondo was using the 16:00:20</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 3<br>4<br>5<br>6                                                                                                    | MR. KESLAR: Same objection. Same instruction not to answer that. Q. Allyn W. Gibson? MR. KESLAR: Same objection. 15:58:26 Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2<br>3<br>4<br>5<br>6                                                                                                          | A. I don't believe that I called them in reference to our conversation, no.     Q. Okay. Well, my question is different.     When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3<br>4<br>5<br>6<br>7                                                                                               | MR. KESLAR: Same objection. Same instruction not to answer that. Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. Allyn D. Gibson?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2<br>3<br>4<br>5<br>6<br>7                                                                                                     | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 3<br>4<br>5<br>6<br>7<br>8                                                                                          | MR. KESLAR: Same objection. Same instruction not to answer that. Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. Allyn D. Gibson? MR. KESLAR: Same objection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8                                                                                                | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | MR. KESLAR: Same objection. Same instruction not to answer that. Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                                     | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9                                                                                     | MR. KESLAR: Same objection. Same instruction not to answer that. Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. When Dr. Raimondo was using the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                               | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10                                                                               | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist                                                                                                                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12                                                                         | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11                                                                         | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that                                                                                                                                                                                                                                                                                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                                   | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13                                                             | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45                                                                                                                                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                             | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47                                                                                                                                                                                                                                                                                                                                                                               |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14                                                       | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer. Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and                                                                                                                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                       | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the                                                                                                                                                                                                                                                                                                                                     |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15                                                 | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question.  Same instruction not to answer that question.  15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a                                                                                                                                                                                    | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                                 | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you                                                                                                                                                                                                                                                                                     |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment?                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to                                                                                                                                                                                                                                    |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16                                           | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment? MR. KESLAR: Same objection.                                                                                                                                                                                  | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                                     | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?                                                                                                                                                                                                                       |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17                                     | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment?                                                                                                                                                                                                              | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                         | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?  A. I mean, obviously, it wasn't the one 16:01:07                                                                                                                                                                     |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18                               | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question.  Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that 15:58:57 question.                                                                                                                                   | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21                   | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?  A. I mean, obviously, it wasn't the one 16:01:07 that she had handed to me, and no, I don't recall                                                                                                                   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20                   | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that 15:58:57 question. Q. When Dr. Raimondo had the megaphone, did                                                                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22             | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different.  When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying.  Q. Sure. 16:00:32  A. No.  Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?  A. I mean, obviously, it wasn't the one 16:01:07 that she had handed to me, and no, I don't recall her holding anything else.                                                                                        |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21             | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that 15:58:57 question. Q. When Dr. Raimondo had the megaphone, did she suggest or even state that David Gibson was                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different. When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying. Q. Sure. 16:00:32  A. No. Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47 Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?  A. I mean, obviously, it wasn't the one 16:01:07 that she had handed to me, and no, I don't recall her holding anything else. Q. Okay. When Dr. Raimondo was using the                                                   |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22       | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that 15:58:57 question. Q. When Dr. Raimondo had the megaphone, did she suggest or even state that David Gibson was involved in racial profiling? | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24 | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different. When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying. Q. Sure. 16:00:32  A. No. Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?  A. I mean, obviously, it wasn't the one 16:01:07 that she had handed to me, and no, I don't recall her holding anything else.  Q. Okay. When Dr. Raimondo was using the megaphone, did you see her waving a copy of the |
| 3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23 | MR. KESLAR: Same objection. Same instruction not to answer that.  Q. Allyn W. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. Allyn D. Gibson? MR. KESLAR: Same objection. Same instruction not to answer.  Q. When Dr. Raimondo was using the 15:58:35 megaphone, did she call Gibson's Bakery a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that question. 15:58:45 Q. Did she indicate that David Gibson and Allyn Gibson and Allyn D. Gibson worked for a racist establishment? MR. KESLAR: Same objection. Same instruction not to answer that 15:58:57 question. Q. When Dr. Raimondo had the megaphone, did she suggest or even state that David Gibson was                               | 2<br>3<br>4<br>5<br>6<br>7<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23       | A. I don't believe that I called them in reference to our conversation, no.  Q. Okay. Well, my question is different. When Dr. Raimondo was using the 16:00:20 megaphone, or after she used the megaphone, did you call the police based upon what you heard her saying?  A. Thank you for clarifying. Q. Sure. 16:00:32  A. No. Q. Okay. When Dr. Raimondo was using the megaphone, what did she have in her hands other than a megaphone, if anything?  A. I don't know. 16:00:47  Q. Okay. When Dr. Raimondo was using the megaphone to talk to the demonstrators, did you see her holding the flyer that she had handed to you earlier?  A. I mean, obviously, it wasn't the one 16:01:07 that she had handed to me, and no, I don't recall her holding anything else.  Q. Okay. When Dr. Raimondo was using the                                                 |

| Page 218                                                                                                                                                                                                                          | Page 220                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 A. I – I don't recall that, no.                                                                                                                                                                                                 | 1 MR. KESLAR; I think there was a                                                                                                                                                                    |
| 2 Q. When Dr. Raimondo was using the                                                                                                                                                                                              | 2 question pending when we took that break.                                                                                                                                                          |
| 3 megaphone, did she state her endorsement of the                                                                                                                                                                                 | 3 VIDEOGRAPHER: On the record, 4:17.                                                                                                                                                                 |
| 4 message that was on the flyer?                                                                                                                                                                                                  | 4 MR. HOLMAN: Would you read back the                                                                                                                                                                |
| 5 A. I don't recall that. 16:01:40                                                                                                                                                                                                | 5 question, please. 16:18:04                                                                                                                                                                         |
| 6 Q. Did Dr. Raimondo state that she approved                                                                                                                                                                                     | 6 (Record read.)                                                                                                                                                                                     |
| 7 of the protestors standing outside and chanting                                                                                                                                                                                 | 7 MR, KESLAR: I'm going to assert the                                                                                                                                                                |
| 8 and singing and holding signs?                                                                                                                                                                                                  | 8 First Amendment privilege on that, and therefore,                                                                                                                                                  |
| 9 MR. KESLAR: This question calls it                                                                                                                                                                                              | 9 I'm going to instruct you not to answer.                                                                                                                                                           |
| 10 invades into the editorial process, because 16:01:59                                                                                                                                                                           | 10 Q. During the time that you were at the 16:18:33                                                                                                                                                  |
| 11 really, it calls for his interpretations of –                                                                                                                                                                                  | 11 protest, and again, we're focusing solely on                                                                                                                                                      |
| which goes to his state of mind. Therefore, it's                                                                                                                                                                                  | 12 November 10, 2016, was Dr. Raimondo there during                                                                                                                                                  |
| protected by the First Amendment.                                                                                                                                                                                                 | the entirety of the time that you were present at                                                                                                                                                    |
| 14 So I'm going to instruct you not to                                                                                                                                                                                            | 14 the demonstration?                                                                                                                                                                                |
| 15 answer that, 16:02:11                                                                                                                                                                                                          | 15 A. I can't say for sure. 16:18:53                                                                                                                                                                 |
|                                                                                                                                                                                                                                   | 16 Q. Okay. On November 10, approximately how                                                                                                                                                        |
| <ul> <li>Q. So if I understand your testimony today,</li> <li>you spoke briefly to Dr. Raimondo, correct?</li> </ul>                                                                                                              | 17 many different times did you observe Dr. Raimondo                                                                                                                                                 |
| 17 you spoke briefly to Dr. Raimondo, correct?  18 A. Yes.                                                                                                                                                                        | 18 at the demonstration?                                                                                                                                                                             |
|                                                                                                                                                                                                                                   | 19 A. I'm not sure what that question means.                                                                                                                                                         |
| 19 Q. You also heard her speak to two 20 individuals about taking pictures, correct? 16:02:24                                                                                                                                     | 20 Q. Sure. So you can certainly agree with 16:19:14                                                                                                                                                 |
| <b>Q1</b>                                                                                                                                                                                                                         | 21 me that Dr. Raimondo was present for at least                                                                                                                                                     |
| 21 A. Yes.                                                                                                                                                                                                                        | 22 part of the time that you were there at the                                                                                                                                                       |
| 22 Q. And you also heard her and observed her                                                                                                                                                                                     | 22 part of the time that you were there at the demonstration, correct?                                                                                                                               |
| 23 using a megaphone to talk to the demonstrators,                                                                                                                                                                                | <u> </u>                                                                                                                                                                                             |
| 24 correct?                                                                                                                                                                                                                       | 24 A. Yes, sir. 25 O. And you have identified so far four 16:19:26                                                                                                                                   |
| 25 A. Correct. 16:02:39                                                                                                                                                                                                           |                                                                                                                                                                                                      |
| Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                     | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                        |
| Page 219                                                                                                                                                                                                                          | Page 221                                                                                                                                                                                             |
| 1 Q. Did you personally hear or overhear                                                                                                                                                                                          | 1 instances when you saw Dr. Raimondo, correct?                                                                                                                                                      |
| 2 Dr. Raimondo say anything else to anybody else on                                                                                                                                                                               | 2 A. Would you mind recapping them?                                                                                                                                                                  |
| 3 November 10?                                                                                                                                                                                                                    | 3 Q. Sure. One was your conversation with                                                                                                                                                            |
| 4 MR. KESLAR: I'm going to instruct you                                                                                                                                                                                           | 4 Dr. Raimondo. That was one instance, correct?                                                                                                                                                      |
| 5 not to answer about any anything else that she 16:02:57                                                                                                                                                                         | 5 A. Yes. 16:19:45                                                                                                                                                                                   |
| 6 said to you which we've previously objected to as                                                                                                                                                                               | 6 Q. The other instance was when you saw her                                                                                                                                                         |
| 7 privileged.                                                                                                                                                                                                                     | 7 approach two people who were taking pictures.                                                                                                                                                      |
| 8 Q. Do you have any personal knowledge of                                                                                                                                                                                        | 8 Actually, those are two two instances when you                                                                                                                                                     |
| 9 anything else that Dr. Raimondo said on November                                                                                                                                                                                | 9 observed her taking pictures or – strike –                                                                                                                                                         |
| 10 10 other than what you heard in your personal 16:03:14                                                                                                                                                                         | 10 let's start over again. 16:19:58                                                                                                                                                                  |
| 11 conversation with her, what you overheard her                                                                                                                                                                                  | 11 So you actually saw Dr. Raimondo when                                                                                                                                                             |
| 12 saying to two individuals about taking pictures,                                                                                                                                                                               | 12 you two were talking, correct?                                                                                                                                                                    |
|                                                                                                                                                                                                                                   | 13 A. Yes.                                                                                                                                                                                           |
|                                                                                                                                                                                                                                   | 14 Q. You also saw her on two separate                                                                                                                                                               |
| 1                                                                                                                                                                                                                                 | 15 occasions talking to people who were taking 16:20:11                                                                                                                                              |
|                                                                                                                                                                                                                                   | 16 pictures, correct?                                                                                                                                                                                |
| 16 whether there's something privileged? We can                                                                                                                                                                                   | 16 pictures, correct?  17 A. Yes.                                                                                                                                                                    |
| 17 confer.                                                                                                                                                                                                                        | 18 Q. And you also observed her using a                                                                                                                                                              |
|                                                                                                                                                                                                                                   |                                                                                                                                                                                                      |
| 18 THE WITNESS: Yeah, I think that would                                                                                                                                                                                          | 1 10 maconhone coment?                                                                                                                                                                               |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea.                                                                                                                                                                       | 19 megaphone, correct?                                                                                                                                                                               |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea. 20 MR. HOLMAN: Okay. We'll take a break. 16:03:51                                                                                                                     | 20 A. Correct. 16:20:20                                                                                                                                                                              |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea. 20 MR. HOLMAN: Okay. We'll take a break. 16:03:51 21 Off the record.                                                                                                  | 20 A. Correct. 16:20:20 21 Q. So from what you've testified to so far,                                                                                                                               |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea. 20 MR. HOLMAN: Okay. We'll take a break. 16:03:51 21 Off the record. 22 VIDEOGRAPHER: Off the record, 4:03.                                                           | 20 A. Correct. 16:20:20 21 Q. So from what you've testified to so far, 22 there were at least four separate or discrete                                                                              |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea. 20 MR. HOLMAN: Okay. We'll take a break. 16:03:51 21 Off the record. 22 VIDEOGRAPHER: Off the record, 4:03. 23 (Recess taken.)                                        | 20 A. Correct. 16:20:20 21 Q. So from what you've testified to so far, 22 there were at least four separate or discrete 23 times when you observed Dr. Raimondo, correct?                            |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea. 20 MR. HOLMAN: Okay. We'll take a break. 16:03:51 21 Off the record. 22 VIDEOGRAPHER: Off the record, 4:03. 23 (Recess taken.) 24 MR. HOLMAN: We're going back on the | 20 A. Correct. 16:20:20 21 Q. So from what you've testified to so far, 22 there were at least four separate or discrete 23 times when you observed Dr. Raimondo, correct? 24 A. That's correct, sir. |
| 18 THE WITNESS: Yeah, I think that would 19 be a good idea. 20 MR. HOLMAN: Okay. We'll take a break. 16:03:51 21 Off the record. 22 VIDEOGRAPHER: Off the record, 4:03. 23 (Recess taken.)                                        | 20 A. Correct. 16:20:20 21 Q. So from what you've testified to so far, 22 there were at least four separate or discrete 23 times when you observed Dr. Raimondo, correct?                            |

|                | Page 222                                                                       |     | Page 224                                                              |
|----------------|--------------------------------------------------------------------------------|-----|-----------------------------------------------------------------------|
| 7              | on how many separate occasions did you personally                              | 1   | A. From time to time.                                                 |
| 1              | oh now many separate occasions and you personally observe Dr. Raimondo?        | 2   | Q. Okay. Does your wife Lisa shop there as                            |
| 2<br>3         | A. At least four.                                                              | 3   | well?                                                                 |
| 3<br>4         | Q. At least four. Do you recall any other                                      | 4   | A. I don't believe so.                                                |
|                | instances when you observed Dr. Raimondo? 16:20:53                             | 5   | Q. Do you know whether or not shoplifting 16:24:17                    |
| 5              |                                                                                | 6   | is an issue or a problem for the merchants in                         |
| 6              | A. I don't recall any right now.                                               | 7   | Oberlin?                                                              |
| 7              | Q. Did you ever see Dr. Raimondo carrying a                                    | 8   | MR. KESLAR: I'm going to object because                               |
| 8              | sign?                                                                          | 9   | it calls for his state of mind or what he knows                       |
| 9              | A. I don't believe so, no. O. Did you see Dr. Raimondo waving a sign? 16:21:11 |     |                                                                       |
| 10             | ` '                                                                            | 10  | 0 11                                                                  |
| 11             | A. I don't believe so.                                                         | 11  | have been published in the newspaper, and                             |
| 12             | Q. Did you see Dr. Raimondo creating a                                         | 12  | therefore, it's clouded in the First Amendment                        |
| 13             | sign?                                                                          | 13  | privilege and I'm going to instruct him not to                        |
| 14             | A. No.                                                                         | 14  | answer that question.  O. Do you have an understanding as to 16:24:46 |
| 1.5            | Q. Did you see Dr. Raimondo passing out a 16:21:28                             | 15  |                                                                       |
| 16             | sign?                                                                          | 16  | whether shoplifting is a problem or a concern in                      |
| 17             | A. No.                                                                         | 17  | Oberlin?                                                              |
| 18             | Q. Did you ever see Dr. Raimondo passing                                       | 18  | MR. KESLAR: Same objection.                                           |
| 19             | out a flyer?                                                                   | 19  | Same instruction not to answer.                                       |
| 20             | A. Yes. 16:21:59                                                               | 20  | Q. Does the Oberlin News Tribune publish 16:24:58                     |
| 21             | Q. Okay. And when was that?                                                    | 21  | police reports?                                                       |
| 22             | A. The one that she gave to me.                                                | 22  | A. Yes.                                                               |
| 23             | Q. Okay. Other than the flyer that                                             | 23  | Q. Okay. What types of police reports?                                |
| 24             | Dr. Raimondo handed to you, did you see her give                               | 24  | A. Initial incident reports.                                          |
| 25             | a copy of any flyer to anyone else? 16:22:12                                   | 25  | Q. And what are those? 16:25:14                                       |
|                | Molnar Reporting Services, LLC (440) 340-6161                                  |     | Molnar Reporting Services, LLC (440) 340-6161                         |
|                | Page 223                                                                       |     | Page 225                                                              |
| 1              | MR. KESLAR: I'm going to object to that                                        | 1   | A. Under Ohio law, investigatory content                              |
| 2              | because it calls for information you might have                                | 2   | created by law enforcement officers isn't                             |
| 3              | gathered during your reporting process not                                     | 3   | necessarily public record. Police generally have                      |
| 4              | previously disclosed in your news article, and                                 | 4   | to hand over information saying what they saw                         |
| 5              | therefore, there's a First Amendment privilege to 16:22:26                     | 5   | when they arrived on the scene, who's charged, 16:25:27               |
| 6              | it that I'm going to instruct you not to answer.                               | 6   | that sort of information.                                             |
| 7              | Q. Okay. During your observations of                                           | 7   | Q. So do you publish those reports in full                            |
| 8              | Dr. Raimondo, did you ever see her singing?                                    | 8   | or just summaries of the reports?                                     |
| 9              | A. I don't recall that, no.                                                    | 9   | MR. KESLAR: Objection. That gets to                                   |
| 10             | Q. Chanting? 16:22:44                                                          | 10  | the editorial process, decisions as to what 16:25:40                  |
| 11             | A. I also don't recall that.                                                   | 11  | content to put in and what not to put in the                          |
| 12             | Q. Attacking Gibson's Bakery in any way?                                       | 12  | newspaper.                                                            |
| 13             | MR. KESLAR: Objection. I think that                                            | 13  | Therefore, I'm going to instruct you not                              |
| 14             | the characterization would call for Mr. Hawk to                                | 14  | to answer that question.                                              |
| 15             | testify to his state of mind, which is protected 16:22:59                      | 15  | Q. So what are these reports called again? 16:25:44                   |
| 16             | as part of the editorial process. Therefore, I'm                               | 16  | Initial –                                                             |
| 17             | going to instruct him not to answer that                                       | 17  | A. Initial incident reports.                                          |
| 18             | question.                                                                      | 18  | Q. Okay. So if one of your readers looks                              |
| 19             | Q. Did you see Meredith Raimondo blocking                                      | 19  | in the paper, will he or she find the entire                          |
| 20             | the door to Gibson's Bakery? 16:23:13                                          | 20  | report or just portions of the report? 16:25:58                       |
|                | A. No.                                                                         | 21  | MR. KESLAR: That's really just another                                |
| 21             | Q. Did you see Dr. Raimondo talking to the                                     | 22  | way of asking the same question. Therefore, I'm                       |
| 21<br>22       | V. Did you bo Dr. Ramfondo anong to me                                         |     | going to object and instruct you not to answer                        |
| 22             |                                                                                | / - |                                                                       |
| 22<br>23       | police?                                                                        | 23  | <del> </del>                                                          |
| 22<br>23<br>24 | police? A. No.                                                                 | 24  | that question.                                                        |
| 22<br>23       | police?                                                                        |     |                                                                       |

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |     | 7 000                                                                                          |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|------------------------------------------------------------------------------------------------|
|                  | Page 226                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |     | Page 228                                                                                       |
| 1                | by the police reports that are published in the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1   | <ul> <li>A. I'd have to look at my resume to be</li> </ul>                                     |
| 2                | newspaper?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 2   | absolutely sure, but I believe since 2010.                                                     |
| 3                | MR. KESLAR: That question goes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 3   | Q. Okay. So that's roughly eight years?                                                        |
| 4                | objection. That question goes to the editorial                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 4   | A. Yes, as well as time before that.                                                           |
| 5                | process, decisions on what content to put and 16:26:19                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 5   | Q. Okay. So in the roughly eight years 16:28:17                                                |
| 6                | what not to put into the newspaper, and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 6   | plus that you've been at the Oberlin News                                                      |
| 7                | therefore, I'm going to instruct you not to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 7   | Tribune strike that,                                                                           |
| 8                | answer that question because it's protected by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 8   | Do you read what's in the newspaper,                                                           |
| 9                | the First Amendment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 9   | your newspaper?                                                                                |
| 10               | Q. So the News Tribune does publish police 16:26:27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 10  | MR. KESLAR: That gets – objection. 16:28:29                                                    |
| 11               | reports?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 11  | That gets to the editorial process, and                                                        |
| 12               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 12  | therefore, it's really the same way of asking -                                                |
| 13               | <ul> <li>Q. Okay. So I'm clear, these are reports</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 13  | a different way of asking the same question over                                               |
| 14               | that are in the newspaper?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 14  | and over, which we've objected to on the basis of                                              |
| 15               | A. What do you mean by that? 16:26:38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 15  | privilege. 16:28:39                                                                            |
| 16               | Q. Well, you've just said that the News                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 16  | And therefore, I'm going to instruct you                                                       |
| 17               | Tribune publishes police reports, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 17  | not to answer.                                                                                 |
| 18               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 18  | Q. Have you ever read the Oberlin News                                                         |
| 19               | <ul> <li>Q. So are you telling me that these police</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 19  | Tribune?                                                                                       |
| 20               | reports appear in the News Tribune? 16:26:51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 20  | A. Yes. 16:28:50                                                                               |
| 21               | A. Yes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 21  | Q. Okay. How often do you read the Oberlin                                                     |
| 22               | <ul> <li>Q. How often does the paper publish these</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 22  | News Tribune?                                                                                  |
| 23               | police reports?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 23  | MR. KESLAR: I'm going to object to this                                                        |
| 24               | MR, KESLAR: Objection. That goes to                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 24  | whole line of questioning, because it's beyond                                                 |
| 25               | the editorial process, decisions on what content 16:26:59                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 25  | the scope of what this deposition is about in 16:29:04                                         |
| ļ                | Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |     | Molnar Reporting Services, LLC (440) 340-6161                                                  |
| ,                | Page 227                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1   | Page 229                                                                                       |
| 1                | to put and what not to put in, and maybe how                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1 2 | this case. It invades on the editorial process<br>and it calls for Mr. Hawk to waive his First |
| 2                | often to do it. Therefore, it's clouded in the First Amendment. You do not have to answer that                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 3   | Amendment privilege.                                                                           |
| 3                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 4   |                                                                                                |
| 4                | question.  O. What are the subjects covered by these 16:27:12                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 5   | Therefore, I'm going to instruct you not to answer. 16:29:16                                   |
| 5                | <b>4</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 6   | Q. As someone who has read the Oberlin News                                                    |
| 6                | police reports that are published in the Oberlin                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 7   | Tribune in the past, have you ever seen the paper                                              |
| 7                | News Tribune?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 8   | publish police reports that involve shoplifting?                                               |
| 8                | MR. KESLAR: I'm going to object on two                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9   | MR, KESLAR: Same objection.                                                                    |
|                  | bases. First, the First Amendment privilege that was just — the same objection I just made, but 16:27:25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 10  | Same instruction. 16:29:27                                                                     |
| 10               | was just — the same objection I just made, but 16:27:25 also because that question is vague, and in its                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 11  | Q. During the time that you have worked at                                                     |
| 11<br>12         | vagueness, it does call for privileged                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 12  | the Oberlin News Tribune and read the Oberlin                                                  |
| 13               | information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 13  | News Tribune, have you ever seen police reports                                                |
| 14               | Therefore, I'm going to instruct you not                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 14  | involving robberies in the newspaper?                                                          |
| 15               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 15  | MR. KESLAR: Same objection. 16:29:42                                                           |
| 16               | to answer. 16:27:36 Q. Does the Oberlin News Tribune publish                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 16  | Same instruction. Unless it references                                                         |
| 17               | police reports involving shoplifting?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 17  | a specific article, it calls for privileged                                                    |
| 18               | MR. KESLAR: Same objection regarding                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 18  | information, so I'm going to instruct you not to                                               |
| 19               | editorial process privilege, and therefore, I'm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 19  | answer.                                                                                        |
| 20               | going to instruct you not to answer. 16:27:50                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 20  | Q. Have you ever heard of an instance where 16:29:51                                           |
| 21               | Q. You've been at the Oberlin News Tribune                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 21  | an Oberlin store employee has run after a                                                      |
| 22               | for about six years, correct?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 22  | suspected shoplifter?                                                                          |
| 23               | A. No. I believe it's been longer than                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 23  | MR. KESLAR: Same objection.                                                                    |
| 23               | that.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 24  | Same instruction.                                                                              |
| _ <del>- 1</del> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 25  | Q. Is shoplifting a subject that is of 16:30:08                                                |
| 25               | () () () If you have have no h |     |                                                                                                |
| 25               | Q. Okay. How long has it been? 16:28:00  Molnar Reporting Services, LLC (440) 340-6161                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |     | Molnar Reporting Services, LLC (440) 340-6161                                                  |

|                                                               | A 115 7441.                                                                                      |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Page 230                                                      | Page 232                                                                                         |
| 1 interest to the readers of the Oberlin News                 | 1 CERTIFICATE                                                                                    |
| 2 Tribune?                                                    | 2 The State of Ohio, ) SS:                                                                       |
| 3 MR. KESLAR: Objection on the basis it                       | 3 County of Medina.)                                                                             |
| 4 calls for speculation, and to the extent it goes            | 4 I, Michelle L. Harper, a Notary Public within and for the State of Ohio, duly commissioned     |
| 5 to the state of mind as to what content you may 16:30:22    | 5 and qualified, do hereby certify that the within                                               |
| 6 or may not want to put in the newspaper.                    | named witness, JASON HAWK, was by me first duly  swom to testify the truth, the whole truth and  |
| 7 Therefore, I'm going to instruct you not                    | nothing but the truth in the cause aforesaid; that                                               |
| 8 to answer.                                                  | 7 the testimony then given by the above-referenced witness was by me reduced to stenotypy in the |
| 9 Q. Do you believe incidents that involve                    | 8 presence of said witness; afterwards transcribed,                                              |
| 10 robbery are matters of interest to the readership 16:30:32 | and that the foregoing is a true and correct  9 transcription of the testimony so given by the   |
| of the Oberlin News Tribune?                                  | above-referenced witness.                                                                        |
| 12 MR. KESLAR: Same objection.                                | 10 I do further certify that this deposition was taken at the time and place in the foregoing    |
| Same instruction not to answer.                               | 11 caption specified and was completed without                                                   |
| Q. Was the November 9, 2016, shoplifting                      | adjournment. 12 I do further certify that I am not a                                             |
| incident involving the three Oberlin students 16:30:55        | relative, counsel or attorney for either party, or                                               |
| something that the newspaper considered to be of              | 13 otherwise interested in the event of this action. IN WITNESS WHEREOF, I have hereunto set my  |
| 17 public interest?                                           | 14 hand and affixed my seal of office at Brunswick,                                              |
| MR. KESLAR: Objection. Goes to state                          | Ohio, on this 9th day of July, 2018.                                                             |
| 19 of mind, editorial process, First Amendment                | 16                                                                                               |
| privilege. I instruct you not to answer. 16:31:08             | 17 Michelle L. Harper, Notary Public                                                             |
| MR. HOLMAN: Just a few more questions,                        | 18 Within and for the State of Ohio                                                              |
| then we'll break for the day if that's good.                  | 19 My commission expires December 25, 2018                                                       |
| 23 MR. KESLAR: That yeah, sounds good.                        | 21                                                                                               |
| 24 Thank you.                                                 | 22 23                                                                                            |
| 25 MR. HOLMAN: Sure. Of course. 16:31:29                      | 24                                                                                               |
| Molnar Reporting Services, LLC (440) 340-6161                 | 25<br>Molnar Reporting Services, LLC (440) 340-6161                                              |
| Page 231                                                      | Page 233                                                                                         |
|                                                               |                                                                                                  |
| 1 Okay. Why don't we, per our prior                           | 1 AFFIDAVIT                                                                                      |
| 2 discussions, why don't we adjourn for the day.              | 2 The State of Ohio, )                                                                           |
| 3 And I think we've all agreed that we are going to           | 3 ) SS:                                                                                          |
| 4 continue this deposition, and we can do it a                | 4 County of )                                                                                    |
| 5 couple of different ways. We can pick a date now 16:32:35   | 5 D.C. N. I. D. His is and forward                                                               |
| 6 or we can exchange dates over the next few days             | 6 Before me, a Notary Public in and for said                                                     |
| 7 that work for everybody.                                    | 7 County and State, personally appeared JASON HAWK,                                              |
| 8 MR. KESLAR: I'd prefer to exchange                          | 8 who acknowledged that he did read transcript his in                                            |
| 9 dates over the next few days.                               | 9 the above-captioned matter, listed any necessary                                               |
| 10 MR. RARRIC: Why don't we do that, yeah. 16:32:50           | 10 corrections on the accompanying errata sheet, and                                             |
| 11 MR. HOLMAN: Okay. So why don't we                          | did sign the foregoing sworn statement and that the                                              |
| exchange dates over the next few days, and why                | 12 same is his free act and deed.                                                                |
| don't we all agree that we will strive to                     | 13 In the TESTIMONY WHEREOF, I have hereunto                                                     |
| 14 continue the deposition during the month of July.          | 14 affixed my name and official seal at this 15 day of A.D. 2018.                                |
| 1.5 Does that sound good? 16:32:58                            | ·                                                                                                |
| 16 MR. RARRIC: That's fair.                                   | 16                                                                                               |
| 17 MR. KESLAR: Sounds fair.                                   |                                                                                                  |
| 18 MR. HOLMAN: Great. Thank you very much                     | 18 19 Notary Public                                                                              |
| 19 for your time, Mr. Hawk.                                   | 20 Notary Public                                                                                 |
| THE WITNESS: Thank you. 16:32:58                              |                                                                                                  |
| VIDEOGRAPHER: Off the record, 4:32.                           | 21 My Commission Everines                                                                        |
| 22 (Deposition adjourned at 4:32 p.m.)                        | 22 My Commission Expires:                                                                        |
|                                                               | 1 / 3                                                                                            |
| 23 ~~~~                                                       |                                                                                                  |
| 23 ~~~~<br>24                                                 | 24                                                                                               |
| 23 ~~~~                                                       |                                                                                                  |

|          |                                                     | · ·· · · · · · · · · · · · · · · · · · |
|----------|-----------------------------------------------------|----------------------------------------|
|          | Page 234                                            |                                        |
| 1        | DEPOSITION ERRATA SHEET                             |                                        |
| 2        |                                                     |                                        |
| 3        | RE: GIBSON BROS., INC., et al., vs. OBERLIN         |                                        |
| 4        | COLLEGE, etc., et al.                               |                                        |
| 5        | Case No.: 17CV193761                                |                                        |
| 6        | Deponent: JASON HAWK                                |                                        |
| 7<br>8   | Deposition Date: 06/27/2018                         |                                        |
| 9        | To the Reporter:                                    |                                        |
| 10       | I have read the entire transcript of my Deposition  |                                        |
| 11       | taken in the captioned matter or the same has been  |                                        |
| 12       | read to me. I request that the following changes    |                                        |
| 13       | be entered upon the record for the reasons          |                                        |
| 14       | indicated. I have signed my name to the Errata      |                                        |
| 15<br>16 | Sheet and the appropriate Certificate and authorize |                                        |
| 16<br>17 | you to attach both to the original transcript.      |                                        |
| 18       |                                                     |                                        |
| 19       |                                                     |                                        |
| 20       |                                                     |                                        |
| 21       |                                                     |                                        |
| 22       |                                                     |                                        |
| 23       |                                                     |                                        |
| 24       |                                                     |                                        |
| 25       | Molnar Reporting Services, LLC (440) 340-6161       |                                        |
|          | woman Reporting Scivices, Life (440) 540-0101       |                                        |
|          | Page 235                                            |                                        |
| 1        | PAGE LINE CORRECTION                                |                                        |
| 1<br>2   | PAGE LINE CORRECTION                                |                                        |
| 3        |                                                     |                                        |
| 4        |                                                     |                                        |
| 5        |                                                     |                                        |
| 6<br>7   |                                                     |                                        |
| 8        |                                                     |                                        |
| 9        |                                                     |                                        |
| 10       |                                                     |                                        |
| 11       |                                                     |                                        |
| 12       |                                                     |                                        |
| 13<br>14 |                                                     |                                        |
| 15       |                                                     |                                        |
| 16       |                                                     |                                        |
| 17       |                                                     |                                        |
| 18       |                                                     |                                        |
| 19<br>20 |                                                     |                                        |
| 21       |                                                     |                                        |
| 22       | NO CHANGES                                          |                                        |
| 23       |                                                     |                                        |
| 24       | IACON HAWA                                          |                                        |
| 25       | JASON HAWK                                          |                                        |
|          | Molnar Reporting Services, LLC (440) 340-6161       |                                        |
|          |                                                     |                                        |

| 1  | CERTIFICATE                                                                                                                                       |  |  |  |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| 2  | The State of Ohio, )                                                                                                                              |  |  |  |
| 3  | County of Medina. )                                                                                                                               |  |  |  |
| 4  | I, Michelle L. Harper, a Notary Public within and for the State of Ohio, duly commissioned                                                        |  |  |  |
| 5  | and qualified, do hereby certify that the within named witness, JASON HAWK, was by me first duly                                                  |  |  |  |
| 6  | sworn to testify the truth, the whole truth and                                                                                                   |  |  |  |
| 7  | nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the |  |  |  |
| 8  | presence of said witness; afterwards transcribed, and that the foregoing is a true and correct                                                    |  |  |  |
| 9  | transcription of the testimony so given by the                                                                                                    |  |  |  |
| 10 | above-referenced witness.  I do further certify that this deposition                                                                              |  |  |  |
| 10 | was taken at the time and place in the foregoing                                                                                                  |  |  |  |
| 11 | caption specified and was completed without                                                                                                       |  |  |  |
| 12 | adjournment.  I do further certify that I am not a                                                                                                |  |  |  |
| 14 | relative, counsel or attorney for either party, or                                                                                                |  |  |  |
| 13 | otherwise interested in the event of this action. IN WITNESS WHEREOF, I have hereunto set my                                                      |  |  |  |
| 14 | hand and affixed my seal of office at Brunswick, Ohio, on this 9th day of July, 2018.                                                             |  |  |  |
| 15 |                                                                                                                                                   |  |  |  |
| 16 | Chelele Co                                                                                                                                        |  |  |  |
| 17 | Michelle L. Harper, Notary Public                                                                                                                 |  |  |  |
| 18 | Within and for the State of Ohio                                                                                                                  |  |  |  |
| 19 | My commission expires December 25, 2018                                                                                                           |  |  |  |
| 20 |                                                                                                                                                   |  |  |  |
| 21 |                                                                                                                                                   |  |  |  |
| 22 |                                                                                                                                                   |  |  |  |
| 23 |                                                                                                                                                   |  |  |  |
| 24 |                                                                                                                                                   |  |  |  |
| 25 |                                                                                                                                                   |  |  |  |

|    |                    |              | Page 235          |
|----|--------------------|--------------|-------------------|
| 1, | PAGE LINE          | CORRECTION   |                   |
| 2  |                    |              |                   |
| 3  |                    |              |                   |
| 4  |                    |              |                   |
| 5  |                    |              |                   |
| 6  |                    |              |                   |
| 7  |                    |              |                   |
| 8  |                    |              |                   |
| 9  |                    |              |                   |
| 10 |                    |              |                   |
| 11 |                    |              |                   |
| 12 |                    |              |                   |
| 13 |                    |              |                   |
| 14 |                    |              |                   |
| 15 |                    |              |                   |
| 16 |                    |              |                   |
| 17 |                    |              |                   |
| 18 |                    |              |                   |
| 19 |                    |              |                   |
| 20 |                    |              |                   |
| 21 |                    |              |                   |
| 22 | NO CHANGES         |              |                   |
| 23 |                    | _            |                   |
| 24 | JASON HAWK         |              |                   |
| 25 |                    | Porvigos II  | JC (440) 340-6161 |
|    | Molnar Reporting S | pervices, Li | (440) 240-0101    |