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[REDACTED],

Plaintiff,

v.

[REDACTED]

Defendants.

)
)
)
)
)
)
)

Case No. [REDACTED]

Judge: [REDACTED]

DEPOSITION OF [REDACTED]

[REDACTED]

Reporter:

[REDACTED]

[REDACTED]

[REDACTED]

1 APPEARANCES OF COUNSEL: (via video conference)

2 For Plaintiff [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 For Defendant [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Also Present:

16 [REDACTED] (Videographer)

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1 REPORTER APPEARING REMOTELY FROM [REDACTED]

2 [REDACTED]
3 ***

4 [REDACTED]: What is that? Okay. All right. It stopped. Okay, we are now on the record in the case of
5 [REDACTED], case number [REDACTED]. I'm [REDACTED],
6 business address of [REDACTED], and I will be
7 conducting today's deposition. Today is [REDACTED], and the time is [REDACTED]. All
8 parties have stipulated and agreed to carry out this deposition via zoom. And all parties understand that
9 this deposition will be videotaped and audio recorded. For the record, can everyone state their name
10 beginning with the plaintiff's attorney?

11 [REDACTED]: Uh, my name is [REDACTED]. I'm representing [REDACTED], the plaintiff.

12 [REDACTED]: Okay.

13 [REDACTED]: Uh, [REDACTED].

14 [REDACTED]: Uh, the both of you are in the same room? That's, that's probably where that noise is coming
15 from. Okay. But we could try it again. I'm sorry. Yeah. I-We can't hear you.

16 [REDACTED]: Can you all use the same, the same microphone if you're in the same room using two
17 different laptops? Can you just use one of the laptops for the sound?

18 [REDACTED]: All right, how's this?

19 [REDACTED]: Oh, that's perfect. Okay.

20 [REDACTED]: I have muted my laptop, but you can hear me, okay?

21 [REDACTED]: Perfect.

22 [REDACTED]: Yes. What [crosstalk]

23 [REDACTED]: Okay. All right, um, so [REDACTED] on behalf of [REDACTED].

24 [REDACTED]: Okay.

25 [REDACTED]: My name is [REDACTED]. I'm here on behalf of [REDACTED] and myself.

1 [REDACTED]: Okay. Today's deposition will be that of [REDACTED]. [REDACTED], please hold up your
2 government-issued ID for identification purposes, please. Okay. Yup. Got it. Perfect. Thank you. The
3 witness has been positively identified. [REDACTED], please raise your right hand. Under the penalties of
4 perjury, do you swear or affirm that the evidence you're about to give will be the truth, the whole truth,
5 and nothing but the truth, so help you God?

6 [REDACTED]: I do.

7 [REDACTED]: All right. Thank you. [REDACTED], you may now begin.

8 [REDACTED],
9 having declared under penalty
10 perjury, to tell the truth, was
11 examined and testified as follows:

12 EXAMINATION BY [REDACTED]

13 [REDACTED]: Thank you.

14 [REDACTED]: You're welcome.

15 [REDACTED]: Good morning. [REDACTED] is it okay if I call you [REDACTED]?

16 [REDACTED]: That's fine. That's fine.

17 [REDACTED]: You know our um, schools were rivals.

18 [REDACTED]: Where is that? You go to [REDACTED]?

19 [REDACTED]: No, further back. I went to [REDACTED].

20 [REDACTED]: Really?

21 [REDACTED]: Yeah. [laugh]

22 [REDACTED]: I know you're from the south, man.

23 [REDACTED]: Yeah, man. You have an older brother, don't you?

24 [REDACTED]: No, sir. I'm an only child except for a 22-year-old sister that I raised and considered, uh, a
25 child of my own.

1 time.

2 [REDACTED]: Okay.

3 [REDACTED]: Okay.

4 [REDACTED]: Give me one second. Okay. This concludes today's deposition. It is now [REDACTED]. A copy of
5 today's video conference can be provided upon written request to [REDACTED]

6 [REDACTED] All right, everyone, enjoy the rest of your day.

7 [REDACTED]: All right, thank you.

8 [REDACTED]: Thank you.

9 [REDACTED]: All right. You're welcome.

10 [END]

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