

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

DEPARTMENT 14

HON. TERRY A. GREEN, JUDGE

LAUREN REEVES,)
)
 PLAINTIFF,)
)
 VS.)
 HOLOGRAM, U.S.A., INC.; ALKI)
 DAVID PRODUCTIONS, INC.;)
 ALKIVIADES DAVID, AN individual,)
 DOES 1 THROUGH 25, INCLUSIVE,)
)
 DEFENDANTS.)
)

CASE NO. BC643099

REPORTER'S TRANSCRIPT OF PROCEEDINGS

OCTOBER 4, 2019; OCTOBER 7, 2019

APPEARANCES:

FOR PLAINTIFF: ALLRED, MAROKO & GOLDBERG
NATHAN GOLDBERG, ESQ.
DOLORES Y. LEAL, ESQ.
RENEE MOCHKATEL, ESQ.
6300 WILSHIRE BOULEVARD, SUITE 1500
LOS ANGELES, CALIFORNIA 90048

FOR DEFENDANTS: VENABLE LLP
ELLYN S. GAROFALO, ESQ.
AMIR KALTGRAD, ESQ.
2049 CENTURY PARK EAST, SUITE 2300
LOS ANGELES, CALIFORNIA 90067

REPORTED BY: JEANESE JOHNSON, CSR NO. 11635
OFFICIAL REPORTER PRO TEMPORE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

M A S T E R I N D E X

OCTOBER 4, 2019; VOLUME 13

ALPHABETICAL/CHRONOLOGICAL INDEX OF WITNESSES

<u>PLAINTIFF'S</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
MEYER, C. BUF		3757	3795	

CHRONOLOGICAL INDEX OF WITNESSES

<u>DEFENDANTS'</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>	<u>F. DIR</u>	<u>F. RE-X</u>
WEISMAN, CORY	3611	3629	3637			
DAVID, ALKIVIADES			3641			
JOHNSON, ALLISON BOTTO	3691	3707	3743	3751	3753	3755

ALPHABETICAL INDEX OF WITNESSES

<u>DEFENDANTS'</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>	<u>F. DIR</u>	<u>F. RE-X</u>
DAVID, ALKIVIADES			3641			
JOHNSON, ALLISON BOTTO	3691	3707	3743	3751	3753	3755
WEISMAN, CORY	3611	3629	3637			

1 CASE NUMBER: BC643099
2 CASE NAME: REEVES VS. HOLOGRAM USA, INC.
3 LOS ANGELES, CALIFORNIA FRIDAY, OCTOBER 4, 2019
4 DEPARTMENT 14 HON. TERRY A. GREEN, JUDGE
5 APPEARANCES: (AS HERETOFORE NOTED.)
6 REPORTER: JEANESE JOHNSON, CSR 11635
7 TIME: 9:20
8

9 --o0o--

10
11 HON. T.A. GREEN: OKAY. JURY IS NOT PRESENT.
12 COUNSEL IS PRESENT.

13 HAVE THEY BUZZED YET?

14 THE COURT REPORTER: I DON'T THINK SO, YOUR
15 HONOR.

16 HON. T.A. GREEN: OKAY. WE'RE READY. OKAY. SO
17 THERE'S BEEN A SLIGHT CHANGE IN PLANS. I HAVE TO LEAVE
18 AT 3:15, SO YOU'LL HAVE FROM 1:30 UNTIL 3:15 TO DO THE
19 WITNESS.

20 MR. GOLDBERG: WE HAVE DR. MEYER AT 1:30. I
21 DON'T KNOW WHETHER THEY CAN FINISH HER OR NOT IN 45
22 MINUTES OR NOT -- I DON'T KNOW.

23 HON. T.A. GREEN: THAT'S ACTUALLY A LONG TIME.

24 MS. GAROFALO: THERE'S A LOT TO COVER, YOUR
25 HONOR.

26 BUT BEFORE WE START, WE DO HAVE TWO ISSUES.

27 HON. T.A. GREEN: OKAY.

28 MS. GAROFALO: THE FIRST BEING THE INCIDENT

1 ACTIONS?

2 MS. GAROFALO: HE HAS NOT.

3 HON. T.A. GREEN: OKAY. NOW, CAN WE GET STARTED?

4 MR. GOLDBERG: AS FAR AS I'M CONCERNED, YES.

5 HON. T.A. GREEN: ALL RIGHT. SO BE THINKING OF
6 WAYS TO SPEAK FAST IN THE AFTERNOON.

7 THE COURT REPORTER: NO.

8 MS. GAROFALO: JUST, YOUR HONOR, SCHEDULING
9 PURPOSES, IF YOU HAVE THIS HEARING ON MONDAY, WHEN WOULD
10 IT HAPPEN?

11 HON. T.A. GREEN: WHENEVER IT'S CONVENIENT.
12 WHATEVER IS -- IT DEPENDS WHERE WE ARE IN THE TRIAL. IF
13 WE WRAPPED UP THE TESTIMONY, WE CAN DO IT AFTER THAT.
14 IF YOU HAVEN'T WRAPPED UP THE TESTIMONY, WE CAN DO IT AT
15 NIGHT. IT'S WHATEVER YOU WANT.

16 MS. GAROFALO: OKAY.

17 HON. T.A. GREEN: OKAY. LET'S BRING THE JURY IN.

18 OKAY. ON THE RECORD, THE JURY IS PRESENT.

19 COUNSEL IS PRESENT.

20 YOU WERE HERE AT 9:17, THANK YOU, AND IT'S NOW 9:31.

21 ALL RIGHT. OKAY.

22 DEFENSE -- I HAD A SMALL CALENDAR. OKAY.

23 DEFENSE, THE FLOOR IS YOURS.

24 MS. GAROFALO: DEFENSE WOULD LIKE TO CALL CORY
25 WEISMAN.

26 HON. T.A. GREEN: ALL RIGHT. MR. WEISMAN.

27 GOOD MORNING, SIR. STAND RIGHT THERE AND MR.

28 CLERK WILL SWEAR YOU IN.

1 THE WITNESS: ALL RIGHT.

2 THE CLERK: PLEASE RAISE YOUR RIGHT HAND. DO YOU
3 SOLEMNLY STATE THAT THE TESTIMONY YOU'RE ABOUT TO GIVE
4 IN THE CAUSE NOW PENDING NOW PENDING BEFORE THIS COURT
5 SHALL BE THE TRUTH, THE WHOLE TRUTH AND NOTHING BUT THE
6 TRUTH, SO HELP YOU GOD?

7 THE WITNESS: I DO.

8 THE CLERK: PLEASE, YOU MAY HAVE A SEAT, SIR.

9 SIR, WOULD YOU PLEASE STATE AND SPELL YOUR NAME
10 FOR THE RECORD.

11 THE WITNESS: C-O-R-Y W-E-I-S-M-A-N.

12 HON. T.A. GREEN: OKAY. WELCOME, SIR.

13 PLEASE PROCEED.

14

15 DIRECT EXAMINATION

16 MS. GAROFALO:

17 Q GOOD MORNING, WEISMAN. I'M ELLYN GAROFALO AND I
18 REPRESENT MR. DAVID AND THE COMPANIES WHO HAVE BEEN SUED
19 IN THIS CASE.

20 WE HAVEN'T MET BEFORE TODAY, HAVE WE?

21 A NO, WE HAVE NOT.

22 Q HAVE WE SPOKEN BEFORE TODAY?

23 A NEVER.

24 Q WHAT IS YOUR OCCUPATION?

25 A I'M SELF-EMPLOYED. I HAVE A COMPANY.

26 Q WHAT KIND OF WORK DO YOU DO?

27 A I DO -- I'M IN THE ENTERTAINMENT INDUSTRY, I
28 MANAGE ARTISTS.

1 Q AND WHO WERE YOU EMPLOYED BY IN 2015?

2 A I WAS EMPLOYED BY HOLOGRAM USA.

3 Q WHAT ABOUT 2016?

4 A SAME.

5 Q AND IN 2015, WHAT WAS YOUR JOB AT HOLOGRAM?

6 A I WAS ONE OF THE SALES MANAGERS FOR THE HOLOGRAM
7 DIVISION. I WAS IN CHARGE OF VENUE MANAGEMENT, SO I
8 TRAVELED THE COUNTRY AND WORKED WITH MR. DAVID ACQUIRING
9 VENUES FOR DISPLAY OF HIS TECHNOLOGIES.

10 Q OKAY. AND HOW ABOUT 2016?

11 A SAME.

12 Q WHEN DID YOU BEGIN WORKING AT HOLOGRAM?

13 A 2014.

14 Q PRIOR TO WORKING AT HOLOGRAM -- DO YOU REMEMBER
15 WHEN IN 2014?

16 A MAY.

17 Q AND PRIOR TO WORKING AT HOLOGRAM OR BEGINNING
18 WORK AT HOLOGRAM IN 2014, HAD YOU WORKED WITH MR. DAVID
19 OR ANY OF HIS COMPANIES?

20 A NO, I HAD NEVER MET HIM BEFORE I WENT TO WORK FOR
21 HIM.

22 Q HOW LONG DID YOU WORK WITH HOLOGRAM?

23 A ALMOST FOUR YEARS.

24 Q SO UNTIL APPROXIMATELY 2018?

25 A YES.

26 Q AND DO YOU RECALL WHEN IN 2018 YOU LEFT THE
27 COMPANY?

28 A RIGHT AROUND THE END OF 2017, JANUARY OF 2018,

1 APPROXIMATELY.

2 Q AND IF YOU DON'T MIND TELLING US, DID YOU LEAVE
3 VOLUNTARILY?

4 A YES.

5 Q AND JUST VERY BRIEFLY, WHAT WAS THE REASON FOR
6 YOUR DEPARTURE?

7 A WELL, THE OFFICES IN BEVERLY HILLS WHERE I WORKED
8 OUT OF HAD CLOSED AND THEY OPENED THE THEATRE ON
9 HOLLYWOOD BOULEVARD AND I HELPED WITH THE DEVELOPMENT OF
10 THE THEATRE. AND ONCE THE THEATRE WAS OPENED, MY
11 SERVICES WERE NO LONGER NEEDED IN THAT RESPECT, SO I
12 DECIDED TO START MY OWN COMPANY AT THAT TIME WITHOUT
13 HAVING TO REINVENT MY JOB THERE.

14 Q AND WAS THERE ANY REASON OTHER THAN WHAT YOU'VE
15 DESCRIBED FOR YOUR DECISION TO LEAVE HOLOGRAM?

16 A NO. NONE.

17 Q WHILE YOU WORKED AT HOLOGRAM, LET'S START WITH
18 2015, DID YOU KNOW LAUREN REEVES?

19 A WELL, I DON'T KNOW THE DATES WHEN I KNEW HER, BUT
20 I HAVE MET HER BEFORE AT THE COMPANY, YES.

21 Q OKAY. AND IN WHAT CAPACITY DID YOU MEET HER?

22 A SHE WAS A FREELANCE COMIC WRITER THAT I REMEMBER
23 AND SHE WAS FRIENDS WITH ANOTHER EMPLOYER THERE. AND
24 SHE HAD COME IN TO TRY TO HELP US WITH SOME COMEDY
25 WRITING FOR SOME OF OUR HOLOGRAPHIC SHOWS THAT WE WERE
26 ABOUT TO PRODUCE.

27 Q OKAY. NOW, DO YOU RECALL WHEN MS. REEVES BEGAN
28 TO WORK ON THE HOLOGRAM SHOWS?

1 A NO, I DON'T BELIEVE SHE EVER ACTUALLY WORKED ON A
2 HOLOGRAM SHOW. I THINK SHE CAME IN AND HELPED DEVELOP
3 SOME IDEAS, THEN BROUGHT IN COMEDIANS FOR AUDITIONS AND
4 THINGS, BUT WE NEVER ACTUALLY PRODUCED ANY CONTENT WITH
5 MS. REEVES THAT I KNOW OF.

6 Q OKAY. NOW, IN 2016, YOU WERE STILL WORKING IN
7 SALES AT HOLOGRAM; IS THAT RIGHT?

8 A I WAS -- SALES AT HOLOGRAM. AND I ALSO TOOK ON
9 AN ADDITIONAL ROLE OF SELLING TIME ON OUR TELEVISION
10 NETWORK, FOTV, SO I HAD A DUAL ROLE AT THE COMPANY AT
11 THE TIME.

12 Q OKAY. YOU WERE NOT INVOLVED, HOWEVER, IN THE
13 WRITING OF SCRIPTS OR --

14 A NO, I WAS NOT NEVER.

15 Q -- AND DEVELOPING SHOWS?

16 A NO, I WAS NOT. I WAS INVOLVED IN ACQUIRING SHOWS
17 THAT WERE ALREADY BEING DEVELOPED OUTSIDE THE COMPANY,
18 BUT NOT ON DEVELOPING THE SHOWS WITH MS. REEVES.

19 Q OKAY. AND WERE YOU AWARE OF THE TYPE OF MATERIAL
20 THAT MS. REEVES WAS CREATING OR OUTLINING FOR HOLOGRAM?

21 A WELL, ALL THE CONTENT FOR HOLOGRAM USA AND FOR
22 OUR FOTV NETWORKS WAS COMEDY, IT HAD AN ADULT EDGE TO IT
23 AND IT WAS A VERY -- IT WAS A VERY -- I WOULD SAY TO
24 SOME PEOPLE SHOCKING, SHOCKING KIND OF COMEDY. THAT WAS
25 LIKE THE HOWARD STERN TYPE OF SHOCK WHEN IT WAS MORE
26 ADULT HUMOR THAN STAND UP IN A CLUB OR SOMETHING OF THAT
27 NATURE.

28 Q AND HOW DO YOU KNOW -- STRIKE THAT.

1 DO YOU KNOW WHETHER MS. REEVES WAS INVOLVED IN
2 DEVELOPING THIS KIND OF EDGY, RAUNCHY HUMOR YOU'VE JUST
3 DESCRIBED?

4 A YES. ALL OF OUR CONTENT WAS BASED ON THAT --
5 BASED ON THAT GENRE.

6 Q DID YOU HAVE PERSONAL CONTACT OR INTERACTIONS
7 WITH MS. REEVES?

8 A I DID.

9 Q AND HOW, IF YOU CAN ESTIMATE, HARD QUESTION, HOW
10 FREQUENTLY IN 2016 WHILE MS. REEVES WAS WORKING WITH
11 HOLOGRAM, DO YOU THINK YOU HAD INTERACTIONS WITH HER?

12 A I THINK I'VE ONLY HAD INTERACTIONS WITH HER ABOUT
13 A HALF A DOZEN TIMES, WHICH IS ALMOST EVERY TIME THAT
14 SHE CAME TO WORK I BELIEVE BECAUSE SHE WASN'T A DAILY
15 EMPLOYEE, SHE WAS FREELANCE AND SHE CAME IN. I WOULD
16 SEE HER ONCE A WEEK OR ONCE EVERY TWO WEEKS OR SOMETHING
17 LIKE THAT DURING THE TIME THAT SHE -- THAT I WAS AWARE
18 THAT SHE WAS WORKING WITH US AND MAYBE A HALF A DOZEN
19 TIMES AT THE MOST I'VE SEEN HER.

20 Q ON ANY OF THE OCCASIONS WHEN YOU SAW MS. REEVES,
21 DID YOU WITNESS MR. DAVID DOING -- STRIKE THAT.

22 HAVE YOU EVER SEEN MR. DAVID WITH MS. REEVES?

23 A YES.

24 Q ABOUT HOW MANY TIMES?

25 A MAYBE THREE OF THE SIX TIMES THAT I'VE SEEN MS.
26 REEVES.

27 Q OKAY. SO ABOUT HALF THE TIMES THAT YOU SAW MS.
28 REEVES AT HOLOGRAM, YOU SAW HER WITH OR NEAR MR. DAVID;

1 CORRECT?

2 A CORRECT.

3 Q HOW OFTEN WERE YOU AT HOLOGRAM DURING THAT PERIOD
4 OF TIME?

5 A EVERY DAY.

6 Q AND WERE YOU WITH THE THEATRE SITE OR --

7 A NO, I WAS IN THE OFFICES.

8 HON. T.A. GREEN: HANG ON, HANG ON. MADAM
9 REPORTER HAS TO TAKE THIS DOWN AND THERE'S A TENDENCY IN
10 ORDINARY CONVERSATION TO TALK -- ANSWER QUESTIONS
11 RAPIDLY, BUT IT'S VERY HARD FOR THE REPORTER TO TAKE IT
12 DOWN.

13 THE WITNESS: CERTAINLY.

14 HON. T.A. GREEN: SO HERE'S THE GAME PLAN.
15 QUESTION, PAUSE; ANSWER PAUSE. QUESTION, PAUSE.

16 THE WITNESS: YES, SIR.

17 MS. GAROFALO: OKAY. I'M GOING TO TAKE THAT AS
18 YOU BEING ADMONISHED AND NOT ME.

19 Q OKAY. SO TELL ME WHERE YOU WERE WORKING IN 2016
20 GENERALLY.

21 A I WAS WORKING IN THE SAME OFFICE AS MR. DAVID AND
22 ALL THE REST OF THE REGULAR EXECUTIVES FROM THE FIRM AT
23 338 NORTH CANON DRIVE.

24 Q PERFECT. OKAY.

25 AND WERE YOU ON THE SAME FLOOR AS MS. REEVES AND
26 MR. DAVID?

27 A YES.

28 Q AND HOW -- DID YOU HAVE A CUBICLE OR AN OFFICE?

1 A AN OFFICE.

2 Q HOW CLOSE WAS YOUR OFFICE TO MR. DAVID'S?

3 A WITHIN SHOUTING DISTANCE.

4 Q OH, NO, ANYTHING BUT SHOUTING.

5 A ABOUT 300 FEET.

6 HON. T.A. GREEN: NORTH AMERICA, YES.

7 THE WITNESS: APPROXIMATELY 300 FEET FROM MY
8 ESTIMATION.

9 MS. GAROFALO:

10 Q COULD YOU SEE MR. DAVID'S OFFICE FROM YOUR
11 OFFICE?

12 A YES.

13 Q AND IN PROXIMITY TO MS. REEVES' OFFICE, CAN YOU
14 ESTIMATE HOW FAR YOUR OFFICE WAS?

15 A CAN I PLEASE RETRACT MY LAST STATEMENT? 300
16 FEET, I JUST REALIZED, IS LIKE A HUNDRED YARDS, THAT'S
17 MUCH TOO FAR AWAY. I WAS ACTUALLY RIGHT ACROSS THE
18 HALL, SO MAYBE 30 FEET.

19 Q OKAY. CAN YOU SHOW US IN THIS COURTROOM?

20 A FROM HERE TO YOU IS ABOUT HOW FAR AWAY I WAS FROM
21 MR. DAVID'S OFFICE.

22 HON. T.A. GREEN: YEAH, I DON'T HAVE
23 MEASUREMENTS.

24 THE WITNESS: I DON'T EITHER, I'M SORRY.

25 HON. T.A. GREEN: IT'S THE LENGTH OF THE JURY
26 BOX.

27 THE WITNESS: OKAY. I JUST REALIZED MY
28 CALCULATIONS WERE OFF, I APOLOGIZE.

1 MS. GAROFALO:

2 Q OKAY. SO YOU COULD SEE MR. DAVID'S OFFICE;
3 CORRECT?

4 A CORRECT.

5 Q DID YOU HAPPEN TO NOTICE WHETHER MR. DAVID'S DOOR
6 WAS GENERALLY OPEN OR CLOSED?

7 A IT JUST DEPENDS IF HE HAD A MEETING GOING ON, BUT
8 IT WAS RANDOM.

9 Q OKAY. AND TELL ME, AGAIN, HOW FAR WERE YOU FROM
10 MS. REEVES' OFFICE.

11 A SHE DIDN'T HAVE AN OFFICE, SHE WORKED IN -- MR.
12 NUSSBAUM, WHO IS ANOTHER EMPLOYEE OF THE FIRM, SHE
13 WORKED WITH HIM CLOSELY. AND THEN I BELIEVE MAYBE THERE
14 WAS AN EMPTY OFFICE SHE MAY HAVE OCCUPIED WHENEVER SHE
15 WAS TEMPORARILY THERE FOR THE DAY, BUT I DON'T REALLY
16 QUITE RECOLLECT THAT.

17 Q OKAY. AND HOW FAR WAS YOUR OFFICE FROM MR.
18 NUSSBAUM'S?

19 A NEXT DOOR.

20 Q ALL RIGHT. SO YOU BELIEVE THAT YOU SAW MS.
21 REEVES APPROXIMATELY SIX TIMES IN 2016?

22 A CORRECT.

23 Q AND DID YOU SPEAK WITH HER? OR WHEN YOU SAY THAT
24 YOU SAW HER, WAS IT PASSING IN THE HALLWAY?

25 A NO, WE SPOKE ABOUT THE PROJECT THAT SHE WAS
26 WORKING ON WITH DAVID NUSSBAUM, WE SPOKE ABOUT MANY
27 THINGS. ABOUT HER BOYFRIEND, ABOUT DIFFERENT THINGS. I
28 REMEMBER SHE WAS VERY PERSONABLE.

1 Q WHAT DID SHE TELL YOU ABOUT HER BOYFRIEND?

2 A JUST THAT HE WAS SOME STAR FROM SATURDAY NIGHT
3 LIVE AND THAT HE WAS -- I DON'T KNOW, JUST BRAGGING
4 ABOUT HER BOYFRIEND KIND OF STUFF.

5 Q OKAY. NOW, THE SIX TIMES THAT YOU SAW HER, WERE
6 THEY SPREAD OUT OVER A PERIOD OF TIME, OR?

7 A YES.

8 Q OKAY. SO YOU SAW HER INTERMITTENTLY THROUGHOUT
9 THE TIME SHE WAS THERE; IS THAT CORRECT?

10 A CORRECT.

11 Q AND YOU SAW HER THREE TIMES, I THINK YOU SAID,
12 WITH MR. DAVID; CORRECT?

13 A APPROXIMATELY.

14 Q AND CAN YOU DESCRIBE ANY OF THOSE INCIDENTS IN
15 DETAIL?

16 A THEY WERE GENERALLY CREATIVE MEETINGS. I
17 REMEMBER ONE DISTINCTLY WHERE I WALKED INTO MR. DAVID'S
18 WITH HER TO TALK ABOUT SOME IDEAS ABOUT SOME TALENT THAT
19 SHE HAD THAT SHE WANTED TO BRING IN FOR AUDITIONS. AND
20 HER AND MR. NUSSBAUM WERE WORKING ON A CONCEPT, AND SO I
21 JUST ATTENDED THE MEETING, BRIEF MEETING, IT WAS MAYBE
22 LESS THAN FIVE MINUTES LONG AND WE JUST TALKED BUSINESS
23 AND THAT WAS BASICALLY IT.

24 Q DO YOU REMEMBER ANY OTHER INCIDENT WITH CLARITY
25 IN WHICH YOU SAW MR. DAVID AND MS. REEVES TOGETHER?

26 A A FEW TIMES IN MR. NUSSBAUM'S OFFICE, WE WERE ALL
27 -- ALL FOUR OF US IN THERE DISCUSSING PROJECTS.

28 Q DURING ANY OF THE OCCASIONS THAT YOU SAW MR.

1 DAVID WITH MS. REEVES, DID MR. DAVID DO OR SAY ANYTHING
2 THAT YOU CONSIDERED TO BE INAPPROPRIATE?

3 A NO.

4 Q DID YOU EVER SEE MR. DAVID TOUCH MS. REEVES IN
5 ANY WAY?

6 A NO.

7 Q DID YOU EVER SEE MR. DAVID THREATEN MS. REEVES?

8 A NO.

9 Q DID YOU EVER HEAR MR. DAVID THREATEN ANYBODY WITH
10 PHYSICAL HARM?

11 A NEVER.

12 Q WHAT WAS YOUR EXPERIENCE WORKING AT HOLOGRAM
13 LIKE?

14 A WELL, MY EXPERIENCE WAS PROBABLY LIKE MANY OF THE
15 PEOPLE THAT WORK THERE, IT WAS A FUN PLACE, IT WAS
16 JOVIAL. THERE WAS A LOT OF DIFFERENT PROJECTS ALL THE
17 TIME, SO IT WAS NOT VERY CORPORATE, IT WAS A VERY LOOSE
18 ENVIRONMENT AS FAR AS THE WAY THAT PEOPLE CAME AND
19 DRESSED AND ACTED. I WAS A FORMER TALENT AGENT, SO I
20 WAS USED TO DRESSING UP IN A SUIT AND TIES AND MUCH MORE
21 CORPORATE. AND THIS WAS A MUCH MORE LIKE CREATIVE
22 ENVIRONMENT I WOULD DESCRIBE IT AS.

23 CAN I JUST GRAB SOME WATER OUT OF HERE?

24 HON. T.A. GREEN: YES.

25 THE WITNESS: I'M SORRY FOR THE DELAY. THANK
26 YOU.

27 MS. GAROFALO:

28 Q OKAY. SO DID YOU EVER HEAR MR. DAVID SAY

1 ANYTHING IN MS. REEVES' PRESENCE THAT YOU CONSIDERED TO
2 BE INAPPROPRIATE?

3 A NO. I WILL QUALIFY THAT. MR. DAVID, AS WELL AS
4 OTHER EMPLOYEES OF THE FIRM, USED TO USE CURSE LANGUAGE
5 ONCE IN A WHILE IN A -- IN A -- IN AN ALMOST JOKING WAY
6 AND THINGS OF THAT NATURE. BUT AS FAR AS INAPPROPRIATE,
7 NOBODY EVER SEEMED OFFENDED BY IT AND IT WAS A GROUP
8 KIND OF A THING, SO THERE WAS NOTHING INAPPROPRIATE OR
9 OFFENSIVE THAT I'VE EVER WITNESSED.

10 Q NOW, ANY OF THE TIMES THAT YOU SAW MS. REEVES IN
11 2016, DID SHE COMPLAIN TO YOU ABOUT ANY CONDUCT BY MR.
12 DAVID?

13 A ONCE SHE WAS IN MR. NUSSBAUM'S OFFICE AND HAD
14 SAID THAT, I GUESS, MR. DAVID, ACCORDING TO HER, HAD
15 TRIED TO KISS HER OR SOMETHING AND I LAUGHED IT OFF. I
16 THOUGHT -- I THOUGHT IT WAS A JOKE, I DIDN'T REALIZE AND
17 SHE DIDN'T SEEM VERY UPSET BY IT, SHE KIND OF SMILED
18 WHEN SHE SAID IT.

19 Q OKAY. SO I WANT YOU TO DESCRIBE HOW YOU -- HOW
20 SHE SAID IT TO YOU. IN A COMPLAINING WAY? IN A
21 FRIGHTENED WAY? IN A HAPPY WAY? TELL ME WHAT YOU
22 OBSERVED OF MS. REEVES' DEMEANOR WHEN SHE TOLD YOU THAT
23 MR. DAVID HAD TRIED TO KISS HER.

24 A WELL, SHE SAT IN A CHAIR, MR. NUSSBAUM WAS IN A
25 CHAIR, I WAS STANDING AT THE DOOR, AND THEY WERE TALKING
26 ABOUT BUSINESS OR WHATEVER AND SHE -- I WALKED IN AND
27 THAT JUST CAME UP IN CONVERSATION BETWEEN THEM AND I HAD
28 SAID, GET OUT OF HERE, I WAS LIKE -- I WAS KIND OF LIKE

1 -- AND SHE SMILED AND HE SAID THAT'S NOT FUNNY AND THAT
2 WAS. AND I -- THAT WAS LIKE THE END OF THE
3 CONVERSATION, THERE WAS NOTHING REALLY EMOTIONAL ABOUT
4 IT, THERE WAS NOTHING TOO DRAMATIC OR SINCERE. I
5 THOUGHT IT WAS A JOKE AT FIRST.

6 Q AND IS IT YOUR SPECIFIC RECOLLECTION THAT MS.
7 REEVES WAS SMILING DURING THE CONVERSATION?

8 A YES.

9 Q AND IT WAS YOUR PERCEPTION THE CONVERSATION WAS
10 BEING HAD IN A JOKING MANNER?

11 A YES, THAT'S MY PERCEPTION.

12 Q OKAY. AND ANY OTHER TIME THAT MS. REEVES SAID
13 ANYTHING TO YOU ABOUT MR. DAVID'S CONDUCT TOWARD HER?

14 A NO.

15 Q AND WHAT WERE YOUR OBSERVATIONS ABOUT MS. REEVES'
16 DEMEANOR IN THE OFFICE ON THE SIX OCCASIONS THAT YOU SAW
17 HER?

18 A I THOUGHT SHE WAS HAPPY AND SHE ENJOYED WORKING
19 THERE AND SHE THOUGHT IT WAS A GOOD OPPORTUNITY. AND I
20 THINK THAT -- I THINK THAT SHE HAD WANTED TO HAVE A
21 FULL-TIME JOB THERE, BUT IT WASN'T AVAILABLE BECAUSE
22 DAVID, I GUESS, HAD -- SINCE THEY HAD A PERSONAL
23 FRIENDSHIP PRIOR, HE HAD RECOMMENDED HER FOR THE JOB
24 BECAUSE WE NEEDED TO EXPAND AT THAT TIME. AND SO SHE
25 WAS BEING ON A TRIAL BASIS TYPE OF THING FROM MY
26 RECOLLECTION.

27 Q I WANT YOU TO TELL ME WHAT WAS THE BASIS FOR YOUR
28 IMPRESSION WHEN YOU OBSERVED MS. REEVES THAT SHE WAS

1 HAPPY.

2 A WELL, SHE WAS ALWAYS SMILING AND ALWAYS IN A VERY
3 COMFORTABLE MODE AND ALWAYS TALKING CREATIVELY AND I
4 FELT LIKE SHE FIT IN THERE. I DIDN'T REALIZE AT THE
5 TIME THAT THERE WAS ANY PROBLEM FROM HER POINT OF VIEW.

6 Q WHEN YOU SAY "FIT IN," ARE THERE PEOPLE WHO WOULD
7 NOT FIT INTO THE ENVIRONMENT AT HOLOGRAM?

8 A SURE.

9 Q TELL ME WHAT YOU MEAN.

10 A WELL, IF SOMEBODY WAS -- LIKE I HAD DESCRIBED
11 MYSELF, COME FROM A CORPORATE WORLD AND NOT USED TO THE
12 CREATIVE WORLD AND THE ENVIRONMENT WHERE COMEDY IS BEING
13 CREATIVE AND PEOPLE ARE BANTERING BACK AND FORTH TO TRY
14 TO COME UP WITH FUNNY, JOKING SCENARIOS FOR TELEVISION
15 SHOWS AND THINGS, THAT'S KIND OF AN OUT OF THE ORDINARY
16 JOB, SO IT MIGHT NOT FIT EVERYBODY'S PERSONALITY OR
17 UPBRINGING IN BUSINESS. BUT FOR MYSELF AND MY POINT OF
18 VIEW, I GREW UP WITH THE ENTERTAINMENT BUSINESS, SO IT
19 WAS A VERY NORMAL ENVIRONMENT.

20 Q OKAY. SO PUTTING ASIDE MS. REEVES AND MR. DAVID,
21 THE GENERAL ENVIRONMENT WAS -- HOW WOULD YOU DESCRIBE IT
22 WHEN YOU SAY, "JOKING," WHAT?

23 A I WOULD DESCRIBE IT AS I'VE NEVER BEEN TO WORK
24 THERE WHERE ANYBODY'S MADE ANY PERSONAL COMPLAINTS. A
25 LOT OF PEOPLE SOMETIMES WERE -- EVERYBODY CAME TO WORK
26 PRETTY HAPPY EVERY DAY. I MEAN, IT WAS JUST A FUN PLACE
27 TO WORK. IT WAS A BIG OPPORTUNITY TO WORK WITH THIS GUY
28 WHO WAS PUTTING LOTS OF MONEY INTO A NEW BUSINESS AND

1 NEW TECHNOLOGY. EVERYBODY SEEMED TO REALLY HUNT AND
2 CLAW TO GET THEIR WAY INTO THE COMPANY BECAUSE IT WAS A
3 VERY DESIRABLE PLACE TO WORK FROM MY POINT OF VIEW.

4 Q AND YOU SAID THAT FROM YOUR PERSPECTIVE, MS.
5 REEVES THOUGHT IT WAS A GOOD OPPORTUNITY TO BE AT
6 HOLOGRAM --

7 A A HUNDRED PERCENT. I DON'T REMEMBER --

8 Q HOLD ON, HOLD ON ONE MOMENT.

9 A GO AHEAD, I'M SORRY.

10 Q WHAT DO YOU BASE THAT ON?

11 A WELL, SHE KEPT COMING BACK WITH GOOD IDEAS AND
12 GOOD IDEAS FOR TALENT AND I'VE BEEN IN THE TALENT
13 BUSINESS 30 YEARS AND I DIDN'T KNOW SOME OF THE TALENT
14 THAT SHE WAS AWARE OF, THAT SHE WAS CULTIVATING AND SO
15 FORTH, SO IT WAS AN INTERESTING PERSON TO HAVE AROUND
16 WITH NEW PERSPECTIVE AND SHE SEEMED TO ENJOY IT.

17 Q AND DID SHE EVER SAY TO YOU THIS IS A GREAT
18 OPPORTUNITY, I LIKE WORKING WITH HOLOGRAMS?

19 A I DON'T RECALL THESE EXPLICIT WORDS, BUT THAT WAS
20 THE IMPRESSION THAT WAS GIVEN TO ME.

21 Q OKAY. SHE SEEMED ENTHUSIASTIC ABOUT WORKING ON
22 THE HOLOGRAMS TO YOU?

23 A YES.

24 Q NOW, WHEN YOU TALK ABOUT BANTERING IN THE OFFICE,
25 WAS THERE BANTERING OF A SEXUAL NATURE?

26 A NO. BUT LIKE I HAD SAID, THERE WAS CURSE WORDS
27 AND THINGS THROWN AROUND I WOULD THINK MORE FREQUENTLY
28 THAN THERE WOULD BE IN A NORMAL CORPORATE WORK

1 ENVIRONMENT, BUT IT WAS COMPLETELY NORMAL FROM A
2 CREATIVE TELEVISION DEVELOPMENT STANDPOINT, THAT IT WAS
3 COMMON EVERY DAY. AND IN ANY COMPANY IN THIS TOWN, AND
4 I'VE WORKED AT MANY OVER 30 YEARS, IT WAS A SIMILAR
5 ENVIRONMENT, SO NOTHING THERE WAS SHOCKING IN ANY WAY.

6 Q CAN YOU GIVE US SOME EXAMPLES OF THE COMPANIES
7 YOU'VE WORKED AT THAT YOU WOULD COMPARE TO HOLOGRAM?

8 MR. GOLDBERG: OBJECTION. 352, YOUR HONOR.

9 HON. T.A. GREEN: OVERRULED.

10 THE WITNESS: I'VE WORKED AT INTERNATIONAL
11 CREATIVE MANAGEMENT, WHICH IS THE ONE OF THE BIG THREE
12 TALENT AGENCIES IN LOS ANGELES. AND WE'VE REPRESENTED
13 PEOPLE LIKE CHRIS ROCK AND HOWIE MANDEL, WHO ARE MY
14 CLIENTS, AND MANY OTHER COMEDIANS WHO ARE IN THE SAME
15 TYPE OF ENVIRONMENT, THE SAME TYPE OF LANGUAGE WITH
16 BANTERING AROUND FREQUENTLY, SO. LIKE I SAID, COMMON
17 PLACE IN THE INDUSTRY. IT WAS A STANDARD WORK PRACTICE
18 THE WAY THAT THIS COMPANY OPERATED FROM MY POINT OF
19 VIEW.

20 MS. GAROFALO:

21 Q OKAY. NOW, AND -- OKAY. DID MR. DAVID AS A BOSS
22 SEEM COMPARABLE TO THE OTHER WORK ENVIRONMENTS YOU HAD
23 BEEN IN?

24 MR. GOLDBERG: OBJECTION.

25 THE WITNESS: HE WAS A LITTLE BIT --

26 HON. T.A. GREEN: EXCUSE ME, WAIT.

27 THE WITNESS: I'M SORRY. I'LL SLOW DOWN.

28 MR. GOLDBERG: 352. I MEAN, OTHER WORK

1 ENVIRONMENTS.

2 HON. T.A. GREEN: WELL, I BELIEVE THAT PART OF
3 THE DEFENSE THEORY IS THAT THIS IS A DIFFERENT TYPE OF
4 WORK ENVIRONMENT.

5 MR. GOLDBERG: WELL, HE'S ALREADY SAID IT'S THE
6 SAME AS ICM. OKAY. I'LL WITHDRAW THE OBJECTION.

7 HON. T.A. GREEN: WELL, IT'S CERTAINLY NOT
8 SOMETHING THAT, YOU KNOW, I DIDN'T GROW UP IN A CREATIVE
9 ENVIRONMENT, SO I DON'T KNOW. I'M MUCH MORE CORPORATE
10 AS YOU WOULD SAY.
11 SO OVERRULED.

12 MR. GOLDBERG: OKAY.

13 THE WITNESS: WHAT WAS THE QUESTION, I APOLOGIZE?

14 MS. GAROFALO:

15 Q WAS MR. DAVID COMPARABLE TO BOSSES IN SOME OF THE
16 OTHER WORK ENVIRONMENTS?

17 A NO.

18 Q HOW WAS HE DIFFERENT?

19 A HE WAS A BILLIONAIRE AND HE WAS A JOVIAL PERSON
20 WHO ENJOYED THE CREATIVE PROCESS. AND MORE CAREFREE
21 ABOUT INVESTING AND HELPING PEOPLE ENVISION THEIR DREAMS
22 THAN MOST BOSSES. MOST BOSSES ARE JUST ABOUT HAVING YOU
23 THERE TO SERVE THEM. AND EVEN IN MY -- I WAS A
24 VICE-PRESIDENT AT ICM AND I EVEN FELT LIKE AT A
25 HIERARCHY, I HAD TO REPORT TO MY BOSSES. AND ALKI WOULD
26 GET IN THE TRENCHES WITH US AND COME UP WITH CREATIVE
27 IDEAS AND TRY TO ELEVATE US IN OUR CAREERS, SO I FELT
28 VERY COMFORTABLE WITH THAT ENVIRONMENT, THAT'S HOW HE

1 DIFFERED.

2 Q NOW, CAN YOU RECALL WITH CLARITY ANY OF THE OTHER
3 TIMES THAT YOU SAW MS. REEVES AT HOLOGRAM?

4 A WE HAD LUNCH MAYBE TWO, I THINK, TIMES AT A
5 CHINESE RESTAURANT WITH DAVID NUSSBAUM AND I -- MAYBE
6 ANOTHER EMPLOYEE. AND IT WAS ALL VERY NORMAL. I MEAN,
7 THERE WAS NEVER ANY COMPLAINTS OR ANYTHING OF THAT
8 NATURE THAT I COULD -- THAT I REMEMBER.

9 Q DO YOU REMEMBER THE LAST TIME YOU HAD LUNCH WITH
10 HER, CAN YOU ESTIMATE A MONTH?

11 A THE DATE AND MONTH, IS THAT WHAT YOU SAID?

12 Q YEAH.

13 A NO, I DON'T.

14 Q OKAY. NOW, IS THE BANTERING IN THE OFFICE THAT
15 YOU'VE JUST DESCRIBED, COMEDIC KIND OF BANTERING.
16 HAD YOU EVER --

17 A CERTAINLY.

18 Q -- WITNESSED MS. REEVES PARTICIPATING IN THAT
19 KIND OF BANTERING?

20 A YES.

21 Q DID SHE EVER SEEM TO YOU, APPEAR TO YOU, TO BE
22 OFFENDED OR UPSET?

23 A NEVER.

24 Q DID YOU EVER SEE MS. REEVES IN THE OFFICE AT ANY
25 TIME WHEN SHE APPEARED, AT LEAST TO YOU, TO BE UPSET,
26 WITHDRAWN, OFFENDED?

27 A NO.

28 HON. T.A. GREEN: OKAY. GUYS, YOU'RE --

1 MS. GAROFALO: LET ME JUST FINISH.

2 Q ANYTHING OF THAT NATURE?

3 A NO.

4 Q DO YOU RECALL THE LAST TIME YOU SAW MS. REEVES?

5 A IT WOULD BE IN THE OFFICE, WHENEVER THAT WAS, IN
6 2016.

7 Q AT SOME POINT -- DID MS. REEVES LEAVE AT SOME
8 POINT?

9 A YES, BUT NOT WITH ANY FANFARE. I JUST -- PEOPLE
10 CAME AND GO THERE BECAUSE THERE WAS A APPROXIMATELY A
11 HUNDRED EMPLOYEES BETWEEN TWO COMPANIES AND SHE WAS
12 TEMPORARY HELP, SO I DIDN'T REALLY PAY MUCH ATTENTION TO
13 HER COMING AND GOING.

14 Q DID YOU SEE MS. REEVES ON THE DAY SHE LEFT?

15 A NO.

16 Q DID MS. REEVES EVER TELL YOU ANYTHING ABOUT THE
17 CIRCUMSTANCES UNDER WHICH SHE LEFT?

18 A NO.

19 Q HAVE YOU SEEN OR SPOKEN TO MS. REEVES SINCE?

20 A NO, I HAVE NOT.

21 Q OKAY.

22 MS. GAROFALO: I HAVE NO FURTHER QUESTIONS.

23 HON. T.A. GREEN: THANK YOU.

24 CROSS.

25 MR. GOLDBERG: YES, YOUR HONOR.

26 ///

27 ///

28 ///

CROSS EXAMINATION

1
2 MR. GOLDBERG:

3 Q GOOD MORNING.

4 A GOOD MORNING.

5 Q YOU SPOKE TO A LAWYER FROM THE GLASER FIRM ABOUT
6 THIS BEFORE YOU TOOK THE STAND, DIDN'T YOU?

7 A I GUESS. I DON'T KNOW. I DIDN'T SPEAK TO
8 ANYBODY REALLY. I TEXTED A COUPLE TIMES.

9 Q SO YOU ARE TELLING US THAT COUNSEL BROUGHT YOU UP
10 HERE, NEVER TALKED TO YOU AND YOU DIDN'T TALK TO ANY
11 ATTORNEY ABOUT WHAT YOU KNEW OR DIDN'T KNOW ABOUT THIS
12 SITUATION?

13 A THE ONE TIME I -- THE ONE TIME, I DID, YOU'RE
14 CORRECT. I DIDN'T -- I DIDN'T KNOW YOU WERE JUST
15 TALKING ABOUT --

16 Q OKAY. AS A MATTER OF FACT, DIDN'T YOU COME TO A
17 MEDIATION WITH MR. DAVID IN THIS PARTICULAR CASE
18 SOMETIME IN 2016?

19 A NEVER.

20 Q DIDN'T YOU APPEAR?

21 A WRONG GUY.

22 Q WERE YOU THERE BY YOURSELF WITH SOME LAWYERS?

23 A NEVER. I DON'T -- I DON'T EVEN KNOW WHAT YOU'RE
24 TALKING ABOUT.

25 Q SO YOU'RE SAYING THAT YOU DON'T HAVE ANY
26 RECOLLECTION OF HAVING COME TO A MEDIATION INVOLVING
27 THIS CASE?

28 A HOW WOULD I HAVE A RECOLLECTION, I NEVER CAME TO

1 A MEETING.

2 Q OKAY. THAT'S FINE.

3 NOW, WITH REGARD TO YOUR RELATIONSHIP WITH MR.
4 DAVID, DO YOU -- OUTSIDE OF THE WORK SITUATION YOU
5 MENTIONED, DO YOU HAVE ANY KIND OF OTHER RELATIONSHIP
6 WITH HIM?

7 A I DO NOT.

8 Q OKAY. DO YOU GO TO ANY KIND OF MEETINGS WITH
9 HIM?

10 A I HAVE IN THE PAST.

11 Q WHEN'S THE LAST TIME YOU WENT TO ANY KIND OF
12 MEETING WITH HIM?

13 A 2016.

14 Q AND DID YOU -- DO YOU HAVE -- HAVE YOU SEEN HIM
15 SINCE THEN?

16 A YES, I HAVE.

17 Q WHEN'S THE LAST TIME YOU SAW MR. DAVID?

18 A OH, PROBABLY ABOUT FOUR MONTHS AGO.

19 Q OKAY. AND WHAT WAS THE -- WHAT WAS THE REASON
20 YOU SAW HIM?

21 A I WAS WALKING PAST HIS THEATRE ON HOLLYWOOD
22 BOULEVARD AND I STOPPED IN TO SAY HELLO.

23 Q OKAY. SO, NOW, WITH REGARD TO THE -- JUST TO
24 CLARIFY THE TWO THINGS YOU SAID. LET'S START WITH THE
25 TIME THAT YOU WERE IN AN OFFICE WITH MR. NUSSBAUM AND
26 MS. REEVES AND SHE SAID THAT SHE HAD -- THAT ALKI HAD
27 KISSED HER; CORRECT?

28 A NO.

1 Q WHAT DID YOU SAY?

2 A I SAID THAT -- SHE HAD SAID THAT HE HAD TRIED TO
3 KISS ME AND HAD A SMILE ON HER FACE AND THAT WAS LIKE
4 THE END OF THE CONVERSATION. I SAID, GET OUT OF HERE,
5 AND THEY DIDN'T EXPOUND ON THAT FURTHER.

6 Q DIDN'T YOU SAY -- DID YOU MAKE A JOKE AT THAT
7 TIME?

8 A NOT THAT I REMEMBER.

9 Q DID YOU SAY THAT "I DON'T UNDERSTAND THE PROBLEM,
10 I'D SUCK HIS DICK IF HE ASKED ME TO"?

11 A ABSOLUTELY NOT.

12 Q AND --

13 A I DON'T KNOW WHERE YOU WOULD GET SOMETHING LIKE
14 THAT, BUT THAT'S INSANE.

15 Q AND DID YOU TELL MR. DAVID THAT MS. REEVES HAD
16 MENTIONED THAT HE TRIED TO KISS HER?

17 A NO, BECAUSE I THOUGHT SHE WAS JOKING.

18 Q YEAH.

19 DID YOU EVER SEE MR. DAVID IN THE WORKPLACE WITHOUT HIS
20 CLOTHES ON?

21 A NO, I NEVER DID.

22 Q DID YOU EVER SEE HIM IN THE WORKPLACE WHERE HE
23 WAS PARTIALLY CLOTHED?

24 A NO.

25 Q ARE YOU FAMILIAR WITH THE TERM "MAN-GINA"?

26 A I AM.

27 Q DO YOU KNOW WHETHER MR. DAVID EVER DID THE
28 MAN-GINA AT WORK?

1 A NO, BUT I'VE HEARD STORIES IN THE PRESS AND SO
2 FORTH, I DON'T KNOW IF I BELIEVE THEM, BUT I'VE NEVER
3 SEEN IT MYSELF.

4 Q OKAY. AND DID YOU EVER SEE MR. DAVID PUT HIS
5 HANDS ON THE NECK OF ANY WOMAN AT WORK?

6 A NEVER.

7 Q OKAY. DID YOU EVER SEE MR. DAVID TAKE A WOMAN'S
8 FINGER AND PUT IT IN HIS MOUTH?

9 A NO.

10 Q YOU DON'T THINK HE WOULD DO THAT, DO YOU?

11 A I DON'T KNOW IF HE WOULD DO THAT, BUT I'VE NEVER
12 SEEN THAT.

13 Q OKAY. DID YOU EVER SEE MR. DAVID GO UP TO
14 SOMEBODY'S WINDOW AT WORK, TAKE OFF HIS SHIRT, PRESS HIS
15 CHEST AND NIPPLES AGAINST THEIR OFFICE DOOR?

16 A IS THAT WHERE THE NIPPLES ARE ON THE CHEST? NO,
17 I NEVER SAW. NO, I NEVER SAW ANYTHING LIKE THAT.

18 Q NEVER SAW THAT. UH-HUH.

19 DID YOU EVER SEE MR. DAVID TAKE OUT HIS BELT AT
20 WORK AND USE IT ON A TABLE?

21 A NO.

22 Q UM-HMM.

23 NOW, YOU SAID THAT YOUR JOB WAS IN RELATIONSHIP TO THE
24 HOLOGRAMS?

25 A CORRECT.

26 Q AND WERE YOU EVER PRESENT WHEN MS. REEVES BROUGHT
27 COMEDIANS TO GO TO THE THEATRE DOWNSTAIRS ON THE FIRST
28 FLOOR AND DO A DEMONSTRATION?

1 A YES.

2 Q HOW MANY TIMES WERE YOU PRESENT WHEN MS. REEVES
3 DID THAT?

4 A ONCE OR TWICE.

5 Q OKAY. AND ARE YOU AWARE OF HOW MANY TIMES SHE
6 ACTUALLY DID THAT?

7 A NO, I'M NOT.

8 Q OKAY. WAS -- THAT WAS PART OF WHAT SHE WAS
9 SUPPOSED TO DO, CORRECT, IS SHOW --

10 A I WASN'T IN CHARGE OF MS. REEVES' WORK SCHEDULE
11 SO ALL I KNEW WAS THAT SHE WAS HIRED TO HELP BRING
12 COMEDIANS TO DO SOME WORK FOR US AS HOLOGRAPHIC
13 STANDS-IN AND POSSIBLY WRITING SOME SKETCHES. THAT'S
14 ALL I KNOW ABOUT HER JOB.

15 Q YOU MENTIONED SOMETHING ABOUT MATERIALS OR THINGS
16 THAT MS. REEVES HAD WRITTEN IN CONNECTION WITH THE
17 HOLOGRAM SHOWS; RIGHT?

18 A NO, I DIDN'T.

19 Q YOU DIDN'T.
20 SO DID SHE WRITE ANY SCRIPTS WHILE SHE WAS WORKING AT
21 HOLOGRAM?

22 A I ASSUME THAT WAS ONE OF HER ROLES, BUT I NEVER
23 SAW ANY OF HER SCRIPTS.

24 Q SO DID YOU EVER SEE ANYTHING THAT MS. REEVES
25 CREATED, WROTE?

26 A NO, I DID NOT.

27 Q AND WERE YOU HER BOSS?

28 A NO.

1 Q WHO WAS?

2 A I BELIEVE DAVID NUSSBAUM WAS HER BOSS.

3 Q UM-HMM.

4 A BUT THERE WAS -- IT WAS A VERY LOOSE STRUCTURE,
5 WE ALL WORKED TOGETHER AS TEAMS. AND AS I SAID EARLIER,
6 SHE WAS TEMPORARY AND NOT FULL-TIME HELP, SO SHE WAS IN
7 AND OUT INTERMITTENTLY, SO I WASN'T CLEAR ON WHAT HER
8 ROLE WAS OR WHO HER BOSS WAS, BUT SHE SEEMED TO BE VERY
9 HAPPY DURING HER TIME THERE.

10 Q SURE.

11 BY THE WAY, YOU NEVER SAW MR. DAVID TAKE HIS PANTS DOWN
12 AT WORK, DID YOU?

13 A NO.

14 Q OKAY. DID YOU EVER GET INTO AN ARGUMENT WITH MS.
15 REEVES ABOUT CATCALLING WOMEN OUTSIDE THE HOLOGRAM
16 STUDIO?

17 A ABOUT DOING WHAT?

18 Q CATCALLING WOMEN OUTSIDE THE HOLOGRAM STUDIO.

19 A I DON'T EVEN KNOW WHAT THAT IS.

20 Q OKAY. DO YOU RECALL MS. REEVES EVER TELLING YOU
21 THAT WOMEN DON'T LIKE TO BE CATCALLED?

22 A NO, I DON'T.

23 Q DO YOU RECALL ANY ARGUMENT LIKE THAT BETWEEN
24 YOURSELF AND MS. REEVES?

25 A NO.

26 Q DID YOU EVER TALK TO MS. REEVES ABOUT GOING BACK
27 AND FORTH TO VEGAS, THAT YOU WERE GOING BACK AND --

28 A NOT THAT I CAN RECALL.

1 Q WERE YOU GOING BACK AND FORTH TO THE VEGAS DURING
2 THE TIME IN 2016 WHEN MS. REEVES WAS AT THE HOLOGRAM
3 THEATRE?

4 A I'VE BEEN TO VEGAS HUNDREDS OF TIMES FOR MY JOB
5 AND ALSO PRIVATELY, SO I DON'T KNOW IF THAT EVER CAME UP
6 IN OUR CONVERSATIONS. MOST OF OUR CONVERSATIONS WERE
7 BRIEF AND ABOUT WORK, BUT I DON'T RECALL.

8 Q BUT YOU DON'T RECALL EVER TALKING TO MS. REEVES
9 ABOUT THE REASONS YOU WERE GOING TO VEGAS, DID YOU?

10 A IF I DID, IT WOULD HAVE BEEN ABOUT HOLOGRAM
11 SALES.

12 Q YEAH.
13 NOW, YOU SAID THAT MR. DAVID -- THAT THERE WERE
14 OCCASIONS WHEN YOU'D BE IN A MEETING WITH MR. DAVID AND
15 MS. REEVES AND IT WAS A NORMAL BUSINESS MEETING;
16 CORRECT?

17 A CORRECT.

18 Q AND ON HOW MANY OCCASIONS DID YOU SAY THAT YOU
19 WERE PRESENT WHEN BOTH MR. DAVID AND MS. REEVES WERE
20 PRESENT?

21 A MAYBE TWO TIMES -- TWO OR THREE TIMES, THE MOST.

22 Q AND ON THOSE OCCASIONS, WOULD YOU DESCRIBE IT AS
23 A NORMAL BUSINESS MEETING?

24 A NORMAL, FRIENDLY, NO -- NOTHING OUT OF THE
25 ORDINARY.

26 Q PEOPLE EXCHANGING IDEAS?

27 A CORRECT.

28 Q AND ON THOSE OCCASIONS, MR. DAVID DID NOT TOUCH

1 MS. REEVES; CORRECT?

2 A CORRECT.

3 Q HE DIDN'T SHOW OFF HIS MAN-GINA; RIGHT?

4 A NO.

5 Q HE DIDN'T PULL HIS PANTS DOWN?

6 A NO, HE DID NOT.

7 Q HE DIDN'T GRAB HER NECK?

8 A NOPE.

9 Q HE DIDN'T TAKE HIS FINGER AND PUT IT IN HIS
10 MOUTH --

11 A NO.

12 Q -- OR ANY OF THAT CORRECT; CORRECT?

13 A RIGHT.

14 Q NOW, WERE YOU AWARE OF THE FACT THAT AT SOME
15 POINT MS. REEVES WAS NO LONGER WORKING ON THE HOLOGRAM
16 SIDE AND SHE WAS EMPLOYED WORKING ON A NEW SHOW?

17 A NO.

18 Q YOU DIDN'T KNOW THAT?

19 A NO.

20 Q DID YOU KNOW WHAT MS. REEVES' ROLE WAS AT THE
21 COMPANY AT THE TIME THAT SHE LEFT THE COMPANY?

22 A I KNEW THAT SHE WAS COLLABORATING WITH MR.
23 NUSSBAUM TO BRING IN COMEDIANS AND TALK -- AND TRY TO
24 START SOME HOLOGRAPHIC COMEDIC TALENT AND SHOWS,
25 DEVELOPMENT, I WOULD CALL IT.

26 Q YOU MENTIONED THERE WERE ABOUT A HUNDRED
27 EMPLOYEES; IS THAT CORRECT?

28 A BETWEEN THE TWO COMPANIES MR. DAVID OWNED, YES.

1 Q WOULD THAT BE A FAIRLY ACCURATE ESTIMATE?

2 A IN MY OPINION, I COULD BE OFF BY 10 OR 20, BUT
3 THAT'S -- I'D SAY --

4 Q AND HOW MANY OF THOSE PEOPLE WORKED ON THE
5 HOLOGRAM SIDE?

6 A APPROXIMATELY A THIRD, MAYBE LESS THAN A THIRD.

7 Q ABOUT 30, MAYBE?

8 A 20 TO 30.

9 Q OKAY. AND -- HOLD ON ONE SECOND.

10 A THAT INCLUDES SALESPEOPLE AND EXECUTIVES.

11 Q I BEG YOUR PARDON?

12 A I SAID THAT INCLUDES SALESPEOPLE AND EXECUTIVES
13 ENTIRELY, NOT JUST SALES.

14 Q ALL RIGHT.

15 MR. GOLDBERG: GIVE ME ONE SECOND, YOUR HONOR, IF
16 I MAY. I JUST NEED TO CHECK SOMETHING.

17 HON. T.A. GREEN: SURE.

18 MR. GOLDBERG: I HAVE NOTHING FURTHER, YOUR
19 HONOR.

20 HON. T.A. GREEN: THANK YOU.

21 REDIRECT.

22 MS. GAROFALO: JUST BRIEFLY.

23

24 REDIRECT EXAMINATION

25 MS. GAROFALO:

26 Q MR. WEISMAN, YOU JUST TOLD MR. GOLDBERG THAT
27 THERE WERE A HUNDRED EMPLOYEES AROUND.

28 DO YOU KNOW HOW MANY OF THOSE WERE ACTUAL EMPLOYEES WITH

1 EMPLOYMENT AGREEMENTS?

2 A NO, I DON'T.

3 Q DO YOU KNOW HOW MANY -- WELL, LET ME ASK IT THIS
4 WAY:

5 IT'S TYPICAL IN THE ENTERTAINMENT BUSINESS FOR PEOPLE TO
6 WORK ON SHOWS AND LEAVE; CORRECT?

7 A CORRECT.

8 Q AND SOMETIMES PEOPLE WORK AS, I DON'T KNOW IF YOU
9 KNOW THE LEGAL TERM, BUT INDEPENDENT CONTRACTORS AND
10 THEY ARE NOT ACTUAL EMPLOYEES?

11 A CORRECT.

12 Q DO YOU KNOW THAT DISTINCTION?

13 A I DO KNOW THAT DISTINCTION.

14 Q OKAY. AND IF YOU KNOW, WHAT'S A LOAN-OUT
15 COMPANY?

16 A A LOAN-OUT COMPANY IS A COMPANY THAT A PERSON WHO
17 IS AN INDEPENDENT CONTRACTOR USES TO SET UP FOR THEIR
18 TAX PURPOSES SO THAT THEY CAN PAY PAYROLL -- PAY TAXES
19 ONCE THEY ARE PAID AS AN INDEPENDENT CONTRACTOR.

20 Q OKAY. AND ARE YOU --

21 A ACTORS AND OTHER CREATIVE PEOPLE, TRADITIONALLY
22 PRODUCERS THAT ARE ON TEMPORARY JOBS, TRADITIONALLY HAVE
23 THEIR OWN LOAN-OUT COMPANIES. I REPRESENTED MANY ACTORS
24 OVER MY TIME, MOST OF THE ACTORS, IF NOT ALL, I CAN'T
25 REMEMBER ONE THAT DIDN'T HAVE THEIR OWN LOAN-OUT
26 COMPANY.

27 SO, FOR EXAMPLE, EDDIE MURPHY WOULD HAVE EDDIE MURPHY,
28 INC. AND THAT WOULD BE HIS LOAN-OUT COMPANY. YOU WOULD

1 HAVE TO PAY EDDIE MURPHY, INC. SO HE COULD PAY TAXES TO
2 THE GOVERNMENT AND YOU WOULDN'T HAVE TO AS THE EMPLOYER.

3 Q OKAY. SO WHEN YOU WORKED AS AN AGENT OR YOU'RE
4 NOW A MANAGER, ARE YOU INVOLVED IN NEGOTIATING DEALS,
5 CONTRACTS?

6 A I AM.

7 Q AND THEN YOU WOULD KNOW WHO THE PARTIES, IN OTHER
8 WORDS, YOU WOULD KNOW WHO USED THE LOAN-OUT COMPANY AND
9 WHAT IT WAS; CORRECT?

10 A CORRECT.

11 Q AND PEOPLE WHO WORK ON CREATIVE PROJECTS, A FILM,
12 A TELEVISION SHOW, ARE THEY -- THE TALENT ITSELF, IS IT
13 MORE USUAL THAN NOT TO BE AN INDEPENDENT CONTRACTOR?

14 A YEAH, IN ALMOST MOST CASES. ALMOST ALL CASES, I
15 SHOULD SAY.

16 Q SO THE HUNDRED PEOPLE THAT YOU ESTIMATE WERE
17 WORKING AT ALL OF MR. DAVID'S COMPANIES IN 2016, DO YOU
18 KNOW HOW MANY OF THOSE WERE EMPLOYEES WITH EMPLOYMENT
19 AGREEMENTS WORKING UNDER LOAN-OUT AGREEMENTS OR JUST
20 INDEPENDENT CONTRACTORS?

21 A NO, I WOULDN'T. I DID NOT WORK IN
22 ADMINISTRATION, SO I DON'T KNOW THAT.

23 Q AND FOLLOWING THAT, DO YOU KNOW WHETHER MS.
24 REEVES WAS AN EMPLOYEE WITH AN EMPLOYMENT CONTRACT OR AN
25 INDEPENDENT CONTRACTOR?

26 A I DO NOT, BUT BASED ON THE WORK SCHEDULE THAT I
27 OBSERVED AND THE JOB ROLE THAT I FELT THAT SHE WAS IN
28 BASED UPON OBSERVING THOSE THINGS, IT WOULD SEEM TO BE

1 MOST LIKELY AN INDEPENDENT CONTRACTOR FROM MY --

2 Q OKAY. AND WHEN YOU SAY BASED ON THE WORK
3 SCHEDULE THAT YOU OBSERVED, TELL US WHAT YOU MEAN BY
4 THAT.

5 A SHE WAS NOT THERE REGULARLY, CAME AND WENT AS SHE
6 PLEASED, AND THERE WAS VERY -- I DIDN'T SEE HER MORE
7 THAN ABOUT A HALF A DOZEN TIMES IN TOTAL, SO I WOULDN'T
8 THINK A FULL-TIME EMPLOYEE WOULD HAVE THAT TYPE OF
9 SCHEDULE AND LEEWAY.

10 Q DID MR. DAVID EVER COMPLAIN TO YOU ABOUT MS.
11 REEVES' PERFORMANCE?

12 MR. GOLDBERG: OBJECTION. THAT'S BEYOND THE
13 SCOPE OF THE CROSS, YOUR HONOR.

14 HON. T.A. GREEN: OVERRULED. YOU MAY REOPEN YOUR
15 CROSS.

16 THE WITNESS: NOT THAT I CAN REMEMBER. I -- I --
17 CAN I JUST CHECK THAT. I DO REMEMBER ONE TIME HE WAS
18 LOOKING FOR HER WHEN SHE WASN'T THERE AND WONDERED WHY
19 AND I THINK HIM AND MR. NUSSBAUM DISCUSSED THAT, BUT I
20 WASN'T INVOLVED.

21 MS. GAROFALO: OKAY. I HAVE NO FURTHER
22 QUESTIONS.

23 THANK YOU, MR. WEISMAN.

24 MR. GOLDBERG: NOTHING FURTHER, YOUR HONOR.
25 NOTHING FURTHER.

26 HON. T.A. GREEN: ALL RIGHT. THANK YOU, SIR.
27 YOU'RE EXCUSED.

28 ALL RIGHT. DEFENSE.

1 CASE NUMBER: BC643099
2 CASE NAME: REEVES VS. HOLOGRAM USA, INC.
3 LOS ANGELES, CALIFORNIA FRIDAY, OCTOBER 4, 2019
4 DEPARTMENT 14 HON. TERRY A. GREEN, JUDGE
5 APPEARANCES: (AS HERETOFORE NOTED.)
6 REPORTER: JEANESE JOHNSON, CSR 11635
7 TIME: 9:20
8

9 --oOo--

10
11 HON. T.A. GREEN: OKAY. JURY IS NOT PRESENT.
12 COUNSEL IS PRESENT.

13 HAVE THEY BUZZED YET?

14 THE COURT REPORTER: I DON'T THINK SO, YOUR
15 HONOR.

16 HON. T.A. GREEN: OKAY. WE'RE READY. OKAY. SO
17 THERE'S BEEN A SLIGHT CHANGE IN PLANS. I HAVE TO LEAVE
18 AT 3:15, SO YOU'LL HAVE FROM 1:30 UNTIL 3:15 TO DO THE
19 WITNESS.

20 MR. GOLDBERG: WE HAVE DR. MEYER AT 1:30. I
21 DON'T KNOW WHETHER THEY CAN FINISH HER OR NOT IN 45
22 MINUTES OR NOT -- I DON'T KNOW.

23 HON. T.A. GREEN: THAT'S ACTUALLY A LONG TIME.

24 MS. GAROFALO: THERE'S A LOT TO COVER, YOUR
25 HONOR.

26 BUT BEFORE WE START, WE DO HAVE TWO ISSUES.

27 HON. T.A. GREEN: OKAY.

28 MS. GAROFALO: THE FIRST BEING THE INCIDENT

1 HERE?

2 MS. GAROFALO: I DON'T KNOW.

3 HON. T.A. GREEN: ALL RIGHT. LET'S KEEP THIS
4 SHORT. WE'LL RECONVENE AT 11:15. OKAY.

5 MR. GOLDBERG: THANK YOU, YOUR HONOR.

6 (RECESS)

7 HON. T.A. GREEN: ALL RIGHT. LET'S BRING THE
8 JURY IN, PLEASE.

9 MS. GAROFALO: YOUR HONOR, MS. BOTTO IS HERE.

10 HON. T.A. GREEN: OKAY. ON THE RECORD, THE JURY
11 IS PRESENT. COUNSEL IS PRESENT.

12 PLAINTIFF, DO YOU HAVE A WITNESS YOU WANT TO
13 CALL?

14 MR. GOLDBERG: NO, I'M FINE.

15 HON. T.A. GREEN: YOU KNOW, LIKE I SAID, WHEN IT
16 COMES TIME TO SIGN THE JUDGMENT, I PROMISE I'LL KNOW WHO
17 YOU ARE.

18 OKAY. DEFENSE.

19 MS. GAROFALO: YES, YOUR HONOR. WE WOULD LIKE TO
20 INTERRUPT MR. DAVID'S TESTIMONY TO CALL A WITNESS, ALLI
21 BOTTO.

22 HON. T.A. GREEN: OKAY.

23 MA'AM, PLEASE STAND RIGHT HERE AND MR. CLERK WILL
24 SWEAR YOU IN.

25 THE CLERK: PLEASE RAISE YOUR RIGHT HAND.

26 DO YOU SOLEMNLY STATE THAT THE TESTIMONY YOU'RE
27 ABOUT TO GIVE IN THE CAUSE NOW PENDING BEFORE THIS COURT
28 SHALL BE THE TRUTH, THE WHOLE TRUTH AND NOTHING BUT THE

1 TRUTH SO HELP YOU GOD?

2 THE WITNESS: YES.

3 THE CLERK: THANK YOU. YOU MAY HAVE A SEAT.

4 MA'AM, WILL YOU PLEASE SAY AND SPELL YOUR NAME
5 FOR THE RECORD.

6 THE WITNESS: MY NAME IS ALLISON JOHNSON,
7 A-L-L-I-S-O-N J-O-H-N-S-O-N.

8 THE CLERK: THANK YOU.

9 HON. T.A. GREEN: WELCOME. PLEASE PROCEED.

10 MS. GAROFALO: OKAY.

11

12 DIRECT EXAMINATION

13 MS. GAROFALO:

14 Q GOOD MORNING.

15 IS IT MS. JOHNSON OR MS. BOTTO?

16 A BOTTO IS MY MAIDEN NAME, SO IT'S JOHNSON.

17 Q DO YOU GO BY MS. JOHNSON NOW?

18 A YES.

19 Q THANK YOU FOR BEING HERE.

20 AS YOU MAY KNOW, I REPRESENT MR. DAVID AND SOME
21 OF HIS COMPANIES IN THIS LAWSUIT.

22 DO YOU KNOW ALKI DAVID?

23 A YEAH, I WORKED FOR HIM FOR FIVE YEARS.

24 Q OKAY. DID YOU WORK FOR A PARTICULAR COMPANY?

25 A I STARTED WITH FILMON AND THEN I WORKED WITH
26 HOLOGRAM USA.

27 Q AND IF YOU RECALL, WHAT YEARS DID YOU WORK AT
28 FILMON?

1 A 2012, AND I STILL DID WORK WHEN I WORKED AT
2 HOLOGRAM USA FOR FILMON, SO UNTIL HE CLOSED THE COMPANY
3 IN, LIKE, 2017 IN AUGUST.

4 Q OKAY. SO IF I UNDERSTAND YOU, YOU WERE EMPLOYED
5 BY FILMON, BUT AT SOME POINT, YOU WERE PROVIDING
6 SERVICES OR WORKING ON THE HOLOGRAM SIDE?

7 A YES.

8 Q IS THAT RIGHT?

9 ALL RIGHT. WHILE YOU WERE WORKING AT FILMON,
10 WHAT WAS YOUR POSITION?

11 A SO I STARTED OUT -- WHEN WE WERE DOING LIVE
12 TELEVISION, I WORKED FOR A GIRL WHO WAS ALKI'S ASSISTANT
13 AND THEN SHE QUIT, AND SO ALKI WAS, LIKE, YOU CAN HAVE
14 HER JOB PRETTY MUCH BY MANAGING THE TELEVISION STUDIO WE
15 HAD DOWNSTAIRS.

16 AND I HELPED PRODUCE SHOWS, SET SCHEDULES, DID
17 ALL THAT KIND OF STUFF. AND THEN ONE DAY, WE SWITCHED
18 OVER TO HOLOGRAM TECHNOLOGY, SO FOR THAT COMPANY, I DID
19 -- I WOULD WORK ON THE OPERATIONS TEAM AND I WOULD
20 TRAVEL AROUND AND BUILD HOLOGRAM STAGES AND THEN I WOULD
21 ALSO WORK IN SALES.

22 Q OKAY. AND DO YOU REMEMBER OR CAN YOU ESTIMATE
23 WHEN YOU STARTED TO PROVIDE SERVICES TO HOLOGRAM RATHER
24 THAN FILMON?

25 A WELL, I STARTED DOING HOLOGRAM, BUT THE DAY WE
26 STARTED THE COMPANY, I HELPED KNOCK DOWN A WALL TO HELP
27 MOVE IT INTO AND INSTALL OUR FIRST STAGE.

28 Q OKAY. AND WHEN ABOUT WAS THAT?

1 A 2014 OR EARLY 2015.

2 Q OKAY. AND WHEN YOU WERE AT FILMON, CAN -- YOU
3 SAID YOU HELPED PRODUCE SHOWS; IS THAT RIGHT?

4 A UM-HMM.

5 Q CAN YOU TELL ME WHAT SHOWS YOU CAN RECALL THAT
6 YOU ASSISTED IN IN CONNECTION WITH?

7 A I WORKED ON JANICE DICKINSON'S SHOW, I WORKED ON
8 A SHOW WITH KATO KAELIN.

9 Q I'M SORRY. SPEAK A LITTLE BIT LOUDER, I'M NOT
10 SURE IF THAT MIC IS WORKING, BUT IF YOU COULD SPEAK JUST
11 A LITTLE BIT LOUDER.

12 A I WORKED WITH JANICE DICKINSON AND KATO KAELIN
13 AND THEN PRETTY MUCH ALL THE SHOWS I HELPED SCHEDULE AND
14 GET PEOPLE ON STAGE, BOOKED PEOPLE THAT WOULD COME ON TO
15 THEIR SHOWS, LIKE, GUESTS OF THEIR SHOWS AS WELL.

16 Q OKAY. DID YOU WORK ON BEVERLY HILLS LIVE?

17 A I WAS THERE ON SET, PLUS I HELPED MANAGE THE
18 STUDIO, BUT I DIDN'T -- I DIDN'T, LIKE, PRODUCE OR DO
19 ANYTHING ON THAT SHOW.

20 Q AND WHAT ABOUT THE ORIGINAL BATTLECAM?

21 A OH, YEAH, I DID LOTS WITH BATTLECAM.

22 Q OKAY. AND WHAT SERVICES DID YOU PROVIDE FOR
23 BATTLECAM?

24 A I WOULD HOST SHOWS, I WAS ON CAMERA, I WOULD -- I
25 ACTUALLY, LIKE, KNEW ALL THE BATTLECAMERS PRETTY WELL, I
26 SOMEHOW BECAME LIKE A RING LEADER OF THE PEOPLE ON THIS
27 THING, SO I WORKED VERY -- A LOT ON IT.

28 Q DID YOU ENJOY WORKING ON BATTLECAM?

1 A OH, IT WAS SO MUCH FUN, IT WAS LIKE WORKING ON
2 JACKASS IS THE BEST WAY TO DESCRIBE IT.

3 Q AND THERE WAS A SECOND INCARNATION OR A SECOND
4 ROUND OF BATTLECAM.

5 ARE YOU AWARE OF THAT?

6 A UM-HMM.

7 Q AND DID YOU WORK ON THOSE SHOWS AS WELL?

8 A UM-HMM. I HOSTED A SHOW ON IT.

9 Q YOU WHAT?

10 A I HOSTED A SHOW.

11 Q AND DO YOU KNOW LAUREN REEVES?

12 A UM-HMM.

13 HON. T.A. GREEN: IS THAT A "YES"?

14 THE WITNESS: YES.

15 MS. GAROFALO:

16 Q HOW DO YOU KNOW MS. REEVES?

17 A SHE CAME TO WORK FOR THE COMPANY TWO SEPARATE
18 TIMES.

19 Q DID -- WAS MS. REEVES ALSO A HOST ON THE SECOND
20 BATTLECAM?

21 A I BELIEVE SO. I THINK SHE WAS HIRED TO WRITE AND
22 THEN ALL OF A SUDDEN WAS ON CAMERA BECAUSE I KNOW SOME
23 PEOPLE THAT WORKED IN IT WERE A LITTLE BIT WEIRD ABOUT
24 THAT ALL OF A SUDDEN SHE WANTED TO BE ON CAMERA WHEN SHE
25 WAS HIRED TO WRITE FOR IT.

26 Q SO YOU JUST TOLD US THAT MS. REEVES WORKED DURING
27 TWO SEPARATE PERIODS --

28 A UM-HMM.

1 Q -- AT MR. DAVID'S COMPANIES?

2 A YES.

3 Q WHEN WAS -- IF YOU RECALL, WHEN WAS THE FIRST
4 TIME THAT MS. REEVES WAS HIRED TO PERFORM SERVICES FOR
5 MR. DAVID'S COMPANIES?

6 A I 2014, I BELIEVE, WAS WHEN WE DID THE BEVERLY
7 HILLS LIVE AND SHE CAME TO BE A WRITER ON THAT AND THEN
8 I DON'T KNOW IF SHE QUIT OR GOT FIRED. AND THEN SHE
9 CAME BACK A SECOND TIME WHEN HE STARTED THE SHOWS AGAIN
10 TO WRITE AND SHE WAS GOING TO DO SOME, LIKE, HOLOGRAM
11 ROASTS THAT NEVER HAPPENED.

12 Q CAN WE LOOK AT EXHIBIT 127, WHICH HAS BEEN
13 ADMITTED.

14 AND I'M GOING TO SHOW YOU A DOCUMENT. I'M GOING
15 TO SHOW YOU SOMETHING THAT'S NEXT TO YOU ON THE SCREEN.

16 A YEP.

17 Q THIS IS EXHIBIT 127.

18 DO YOU RECOGNIZE EXHIBIT 127?

19 A YEAH, I DO.

20 Q WHAT IS IT?

21 A IT WAS A SIGN THAT WAS HANGING IN MY OFFICE.
22 THAT WAS A JOKE WITH ONE OF THE GIRLS THAT RAN THE --
23 THIS -- ONE THE MACHINES DOWNSTAIRS IN THE STUDIO. THIS
24 GIRL USED TO LAUGH -- LIKE WE HAD HR, LIKE YELENA WAS
25 OUR -- EVERYBODY WOULD GO TO HER FOR OUR HR NEEDS
26 BECAUSE EVERYBODY WAS ALWAYS COMPLAINING THAT WE DIDN'T
27 HAVE AN HR. SO JANELLE AND I WERE WAS LIKE, OH, WE'LL
28 BE IT AND SINCE EVERYBODY WAS ALWAYS COMPLAINING ABOUT

1 HARASSMENT THAT WE JUST MADE A JOKE AND PEOPLE TOOK IT
2 SERIOUSLY, I GUESS.

3 Q OKAY. SO LET ME START HERE.

4 IS THIS SOMETHING YOU CREATED OR DID YOU --

5 A YEAH, IT WAS LIKE A JOKE -- THAT WE PULLED AN
6 IMAGE OFF OF GOOGLE SEARCH.

7 Q OVER A GOOGLE SEARCH?

8 A YEAH.

9 Q HOW MUCH OF WHAT WE'RE SEEING ON THE SCREEN CAME
10 FROM THE GOOGLE SEARCH?

11 A THE PICTURE.

12 Q AND HOW ABOUT THE WORDS "HER-ASS"?

13 A HER-ASS, YEAH, BECAUSE -- FOR HARASSMENT. SHOULD
14 WE -- JUST -- IT WAS -- HONESTLY A JOKE AND WE PUT IT IN
15 MY OFFICE, THE WHOLE --

16 Q OKAY. HOLD. HANG ON, I'LL GET THERE.

17 A YEAH.

18 Q ALL RIGHT. SO HER-ASS PART?

19 A UM-HMM.

20 Q AND THEN, I CAN'T. CAN YOU MAKE IT A DROP
21 BIGGER, "WE WILL."

22 A "GIVE YOU JUST THE TIP."

23 Q "GIVE YOU JUST THE TIP."

24 AND THE PHOTOGRAPH, DID THAT ALL COME FROM GOOGLE?

25 A YEAH.

26 Q ALL RIGHT. IF YOU COULD GO -- THERE WE GO.

27 AND WHERE IT SAYS, "HR HEADQUARTERS," WAS THAT
28 ALSO ON WHATEVER YOU TOOK FROM GOOGLE?

1 A WELL, I JUST CAN TYPE -- I TYPED THAT OUT WITH MY
2 FINGERS ON THE COMPUTER.

3 Q OKAY. AND OBVIOUSLY YOU PUT THE NAME ALLI BOTTO
4 IN?

5 A YEAH.

6 Q AND WHO IS --

7 A JANELLE BOWER.

8 Q YES.

9 A UM-HMM.

10 Q WHO IS THE JANELLE BOWER?

11 A SHE RAN THE TRICAST MACHINE WITH ALL THE HOLOGRAM
12 SHOWS.

13 Q AND WAS SHE THE WOMAN WHO WAS INVOLVED WITH YOU?

14 A YEAH, WE WORKED VERY CLOSELY TOGETHER.

15 MR. GOLDBERG: I'M SORRY, YOUR HONOR, I DON'T
16 THINK THE QUESTION WAS FINISHED. CAN WE --

17 HON. T.A. GREEN: YEAH. OKAY. YEAH, WE HAVE TO
18 HAVE THE QUESTION, PAUSE/ANSWER, PAUSE.
19 YOUR TURN.

20 MS. GAROFALO:

21 Q IS MS. BOWER THE WOMAN YOU DESCRIBED WHO WORKED
22 WITH YOU ON CREATING THIS AND PUTTING IN IT IN YOUR
23 OFFICE?

24 A YES.

25 Q OKAY. DO YOU KNOW WHEN APPROXIMATELY WHAT YEAR
26 THIS WAS -- DID YOU HANG IT UP, BY THE WAY?

27 A UM-HMM.

28 HON. T.A. GREEN: IS THAT A "YES"?

1 THE WITNESS: YES.

2 2014, I THINK SO.

3 MS. GAROFALO:

4 Q AND DID MR. DAVID TELL YOU -- STRIKE THAT.

5 DID MR. DAVID PROVIDE ANYTHING ON THIS, I'LL CALL
6 IT A POSTER, ANY OF THE CONTENTS?

7 A NO.

8 Q DID MR. DAVID INSTRUCT YOU TO HANG IT UP?

9 A NO.

10 Q DID YOU SEEK MR. DAVID'S CONSENT BEFORE YOU PUT
11 THIS IN YOUR OFFICE?

12 A NO.

13 Q DID YOU EVER HAVE ANY CON- -- STRIKE THAT.

14 DID MR. DAVID EVER ASK YOU ABOUT THIS POSTER?

15 A NO.

16 Q DO YOU KNOW WHETHER MR. DAVID EVER SAW THE
17 POSTER?

18 A NO.

19 Q DID YOU HAVE AN OFFICE OR A CUBICLE?

20 A I HAD AN OFFICE, BUT IT WAS A VERY -- MY FIRST
21 OFFICE WAS, LIKE, A VERY SMALL OFFICE RIGHT OUTSIDE
22 ALKI'S.

23 Q OKAY. AND THAT'S WHERE THIS WAS HANGING IN THAT
24 SMALL OFFICE?

25 A UM-HMM.

26 Q AND DO YOU RECALL ANY INCIDENT WHERE MR. DAVID
27 CAME IN AND SAID SOMETHING THAT WOULD LEAD YOU TO
28 BELIEVE HE NOTICED THIS POSTER?

1 A NO.

2 Q HOW LONG WAS THE POSTER HANGING IN THE OFFICE?

3 A LIKE, A WEEK MAYBE.

4 Q AND DID ANYBODY AT ALL AT THE COMPANY SAY
5 ANYTHING TO YOU OF THE NATURE, THAT'S OFFENSIVE, TAKE IT
6 DOWN?

7 A NO.

8 Q DID ANYBODY, ON THE OTHER HAND, EVER WALK IN AND
9 SAY THAT'S REALLY FUNNY OR SOMETHING SIMILAR?

10 A YEAH.

11 Q AND HOW MANY PEOPLE DO YOU THINK SAW THIS POSTER
12 IN THE WEEK THAT IT WAS UP WHO COMMENTED THAT IT WAS
13 FUNNY, IF YOU CAN RECALL?

14 A SIX PEOPLE. I...

15 Q AND YOU DON'T RECALL A SINGLE PERSON OBJECTING?

16 A NO. AND I ACTUALLY REMEMBER SOME GIRLS THAT NOW
17 ARE USING IT IN THEIR CASES AGAINST MR. DAVID, COMING IN
18 AND SAYING THAT IT WAS FUNNY, AND SO OBVIOUSLY, THEY
19 WERE IN THERE TAKING A PHOTO.

20 Q DO YOU KNOW WHETHER OR NOT MS. REEVES EVER SAW
21 EXHIBIT 127 WHEN IT WAS HANGING IN YOUR OFFICE?

22 A I'M NOT SURE. I DIDN'T REALLY ASSOCIATE MYSELF
23 WITH HER.

24 Q AFTER THEY TOOK THE PHOTO WHY DID YOU TAKE THE
25 POSTER DOWN?

26 A BECAUSE I ALWAYS CHANGE THE THINGS THAT WERE
27 HANGING IN MY OFFICE.

28 Q YOU HUNG OTHER THINGS OF A COMEDIC NATURE IN YOUR

1 OFFICE?

2 A I HAD DRAWINGS OF MY HAIRLESS CAT THAT WOULD WALK
3 AROUND THE OFFICE, I HAD A MAN WITH A MUSTACHE THAT SAT
4 RIGHT BEHIND ME OF A RANDOM PERSON, I HAD NO IDEA WHO IT
5 WAS.

6 Q OKAY. WE CAN TAKE THAT EXHIBIT DOWN,
7 EXHIBIT 127.

8 NOW, YOU -- I THINK -- WELL, LET ME ASK IT THIS
9 WAY. DID YOU LEAVE THE EMPLOY OF MR. DAVID'S COMPANIES
10 FILMON, IN PARTICULAR, VOLUNTARILY?

11 A NO, HE SHUT DOWN THE COMPANY, HE LET EVERYBODY GO
12 WHEN I WAS ABOUT EIGHT MONTHS PREGNANT.

13 Q OKAY. AND WHEN YOU SAY, "HE SHUT DOWN THE
14 COMPANY" --

15 A UM-HMM.

16 Q -- WHAT COMPANY ARE YOU TALKING ABOUT?

17 A HOLOGRAM USA. HE BASICALLY LET EVERYBODY GO IN
18 THE COMPANY BESIDES A COUPLE OF PEOPLE.

19 Q HOLD ON.

20 I -- IF YOU CAN REPEAT THAT BECAUSE I COULDN'T
21 HEAR YOU.

22 A HE LET GO OF PRETTY MUCH EVERYBODY IN THE
23 COMPANY, MAYBE NOT, LIKE, FOUR PEOPLE.

24 Q AND IS -- AT THAT POINT IN TIME, WHICH I BELIEVE
25 YOU TOLD US WAS 2017; CORRECT?

26 A AUGUST OF 2017, YEAH.

27 Q WAS FILMON STILL FUNCTIONING AT THAT TIME, IF YOU
28 KNOW?

1 A YEAH, IT WAS STILL RUNNING.

2 Q OKAY. WAS ONLY HOLOGRAM SHUT DOWN?

3 A I BELIEVE -- EVERYBODY THAT WAS LET GO EVEN FROM
4 FILMON.

5 Q AND THAT WAS IN AUGUST OF 2017 --

6 A UM-HMM.

7 Q -- CORRECT?

8 DO YOU KNOW HOW MANY PEOPLE WERE TERMINATED
9 BECAUSE THE COMPANY SHUT DOWN IN AUGUST OF 2017?

10 A PROBABLY AROUND 40.

11 Q AND AT THAT TIME, HOW LONG HAD YOU BEEN AT THE
12 COMPANY?

13 A IT WAS JUST BEING FIVE YEARS.

14 Q WHAT WAS YOUR REACTION TO THE COMPANY BEING SHUT
15 DOWN?

16 A I MEAN, OBVIOUSLY, I WAS HEARTBROKEN BECAUSE IT
17 WAS THE BEST JOB I HAD EVER HAD IN MY LIFE AND I SAID I
18 WOULD WORK FOR ALKI UNTIL, LIKE, THE DAY I DIED. THERE
19 WAS NO WAY I WOULD EVER GET ANOTHER JOB. AND I WAS
20 EIGHT MONTHS PREGNANT AT THE TIME AND I LEFT WITH, YOU
21 KNOW, NO HEALTH INSURANCE, LET'S FIGURE IT OUT, SO IT
22 WAS A ROUGH TIME, I WOULD SAY.

23 Q WHAT WAS IT ABOUT THE JOB THAT MADE IT THE BEST
24 JOB YOU EVER HAD?

25 A WE HAD -- WE -- AS LONG AS WE GOT OUR STUFF DONE,
26 ALKI DIDN'T HOVER OVER US AND BE, LIKE, WHAT ARE YOU
27 WORKING ON, WHAT ARE YOU DOING, WHAT'S GOING ON? AS
28 LONG AS YOU SHOWED UP, YOU DID YOUR WORK, YOU HAD A JOB

1 AND IT WAS LAID BACK. I DIDN'T -- I COULD COME IN WITH
2 MY PAJAMAS IF I WANTED TO, WHICH I DID.

3 Q AND DURING THE FIVE YEARS THAT YOU WERE AT FILMON
4 AND HOLOGRAM, DID YOU WITNESS MR. DAVID DOING ANYTHING
5 TO ANYONE THAT CAUSED YOU ALARM?

6 A NO.

7 Q AND DURING THE FIVE YEARS THAT YOU WERE WITH
8 FILMON AND HOLOGRAM, DID YOU SEE MR. DAVID -- STRIKE
9 THAT.

10 DID YOU HEAR MR. DAVID SAY ANYTHING TO ANYONE AT
11 THE COMPANY THAT CAUSED YOU TO BE UPSET OR CONCERNED?

12 A NEVER.

13 Q DURING THE FIVE YEARS THAT YOU WERE IN THE
14 COMPANY, WERE YOU EVER SEXUALLY HARASSED BY MR. DAVID?

15 A NEVER. I MADE HIM THE GODFATHER OF MY CHILD. I
16 DOUBT I WOULD MAKE SOME SEXUAL PREDATOR THE GODFATHER OF
17 MY KID.

18 Q NOW, LET'S TALK ABOUT MS. REEVES.

19 HOW MUCH, IF ANY, INTERACTION DID YOU HAVE WITH
20 MS. REEVES AT EITHER POINT IN HER ASSOCIATIONS WITH MR.
21 DAVID'S COMPANIES?

22 A SHE WOULD SIT IN THE GUY'S OFFICE THAT I WORKED
23 NEXT TO MOST OF THE DAY AND I WORKED CLOSELY WITH HIM,
24 SO I WOULD SEE HIM SITTING THERE. I MEAN, SHE WOULD
25 SHOW UP AND SHE WOULD SIT THERE AND DO STUFF. I -- I
26 DID NOT KNOW WHAT SHE WAS DOING. I DIDN'T REALLY PAY
27 ATTENTION, NEVER SAW ANYTHING COME OF WHAT SHE WAS DOING
28 OR GETTING PAID TO DO, SO.

1 Q AND WHO WAS THE GUY WHOSE OFFICE SHE SAT IN?

2 A DAVID NUSSBAUM.

3 Q DID YOU EVER WORK WITH MS. REEVES?

4 A SHE WROTE FOR SOME OF THE SHOWS THAT -- WHICH
5 WERE IN, LIKE, THE STUDIO THAT I WAS MANAGING AND THEN
6 DID SOMETHING OUTSIDE ON A BALCONY, BUT NEVER, LIKE, ON
7 CAMERA TOGETHER THAT I CAN REMEMBER.

8 Q DID YOU EVER HEAR MS. REEVES COMPLAIN ABOUT
9 ANYTHING THAT MR. DAVID DID EITHER TIME SHE WAS
10 EMPLOYED?

11 A NO.

12 Q DID YOU EVER WITNESS MR. DAVID TOUCH MS. REEVES
13 IN ANY WAY THAT YOU FELT WAS INAPPROPRIATE?

14 A NO.

15 Q DID YOU EVER WITNESS MR. DAVID TOUCH MS. REEVES?

16 A NO.

17 Q DID YOU EVER SEE SOMETHING IN THE OFFICE CALLED
18 THE MAN-GINA?

19 A I THINK EVERYBODY HAS SEEN A MAN-GINA, YES, I
20 HAVE.

21 Q OKAY. AND HOW MANY TIMES WAS MR. DAVID
22 DEMONSTRATING THE MAN-GINA?

23 A WE HAD A HOLOGRAM OF HIM DOING IT, SO HALF THE
24 TIME IT WAS AN IMAGE OF A HOLOGRAM.

25 Q HOW WOULD YOU SEE THE IMAGE OF THE HOLOGRAM, IN
26 THE STUDIO OR IN THE OFFICE?

27 A IN THE STUDIO, WHICH WAS RIGHT DOWNSTAIRS BELOW
28 OUR OFFICES.

1 Q AND DID YOU FIND IT OFFENSIVE IN ANY WAY?

2 A NO. NO, I FOUND IT FUNNY.

3 Q HAD -- DID YOU EVER -- DID ANYBODY EVER COMPLAIN
4 TO YOU THAT MR. DAVID'S DEMONSTRATION OF THE MAN-GINA
5 OFFENDED THEM IN ANY WAY?

6 A NO.

7 Q FROM YOUR OWN OBSERVATION, WHAT WAS THE GENERAL
8 REACTION IN THE OFFICE WHEN MR. DAVID SHOWED HIS
9 MAN-GINA?

10 A "THAT'S ALKI." NOBODY WAS EVER OFFENDED REALLY.
11 EVERYBODY THOUGHT IT WAS FUNNY AND HILARIOUS WHILE THEY
12 WERE WORKING THERE UNTIL THEY GOT FIRED AND THEN
13 SUDDENLY SOME THINGS BECOME A PROBLEM.

14 Q DO YOU KNOW FROM YOUR OWN FIRSTHAND EXPERIENCE
15 WHY MR. DAVID ELECTED TO SHUT DOWN THE COMPANIES IN
16 AUGUST OF 2000--

17 MR. GOLDBERG: OBJECTION. OBJECTION. IT CALLS
18 FOR HEARSAY, YOUR HONOR, SHE WOULD HAVE NO BASIS OTHER
19 THAN WHAT --

20 HON. T.A. GREEN: PROBABLY TRUE, PROBABLY TRUE.

21 YOU CAN LAY A FOUNDATION, IF YOU WANT, BUT I
22 THINK MR. GOLDBERG IS RIGHT.

23 MS. GAROFALO:

24 Q WERE YOU AT ALL INVOLVED IN THE DECISION TO SHUT
25 DOWN THE COMPANY?

26 A NO.

27 HON. T.A. GREEN: ALL RIGHT. SUSTAINED.

28 ///

1 MS. GAROFALO:

2 Q NOW, DID YOU EVER SEE MR. DAVID TAKE HIS BELT OFF
3 IN THE OFFICE AND SLAM THE TABLE?

4 A NO.

5 Q DID YOU EVER SEE MR. DAVID PUT HIS HANDS ON
6 ANYBODY'S NECK OR THROAT AND SAY, "LOOK INTO MY EYES"?

7 A NO, DEFINITELY NOT.

8 Q OKAY. HOW WOULD YOU DESCRIBE MR. DAVID'S SENSE
9 OF HUMOR?

10 A HE'S OUT THERE AND KIND OF SAYS WHATEVER ON HIS
11 MIND AND HE KIND OF SAYS THE THINGS THAT EVERYBODY IS
12 THINKING BUT IS TOO AFRAID TO ACTUALLY SAY.

13 Q HOW WOULD YOU DESCRIBE THE CONTENT OF BATTLECAM,
14 THE ORIGINAL BATTLECAM?

15 A I WOULD DESCRIBE IT AS JACKASS, BUT ALL FROM
16 PEOPLE'S HOMES.

17 Q WHAT DOES THAT MEAN?

18 A IF ANYBODY WATCHES MTV'S JACKASS, THEY KNOW. I
19 DON'T KNOW. IF I KNEW THAT I WAS GOING TO GO WORK FOR
20 JOHNNY KNOXVILLE, I WOULDN'T EXPECT TO BE WALKING INTO A
21 BUTTONED UP, COLLARED T-SHIRT LIKE WEARING A SUIT TO
22 WORK KIND OF PLACE, AND THAT'S NOT THE PLACE WE WERE AT.
23 WE WERE NOT WORKING WHERE YOU HAD TO WEAR A SUIT FOR A
24 OUTFIT OR WEAR, LIKE, A DRESS OR ANYTHING. YOU COULD
25 SHOW UP HOWEVER YOU WANTED, AND BATTLECAM WAS CRAZY,
26 JUST PEOPLE LOCKED IN THEIR PARENTS' BASEMENTS COMING UP
27 FROM ACROSS THE COUNTRY.

28 Q BUT THOSE OF US WHO DON'T KNOW THE SHOW THAT

1 YOU'RE TALKING ABOUT, CAN YOU TELL US WHY YOU'RE
2 COMPARING IT TO BATTLECAM?

3 A WHY I'M COMPARING JACKASS?

4 Q YES.

5 A BECAUSE IT'S A BUNCH OF PEOPLE JUST DOING CRAZY
6 STUNTS AND STUFF THAT NORMAL PEOPLE DON'T DO. AND ALKI
7 FOUND PEOPLE THAT WOULD DO CRAZY STUFF AND -- IN THE
8 BEGINNING, I KNOW HE WOULD PAY THEM WHEN THEY WERE ON
9 CAMERA TO DO PRANKS THAT HE ASKED THEM TO DO AND THEY
10 SAID, YEAH, I'LL TACK IT TO MY FOREHEAD.

11 Q OKAY. AND JACKASS IS ON MTV; CORRECT?

12 A UM-HMM.

13 HON. T.A. GREEN: IS THAT A "YES"?

14 THE WITNESS: YES. SORRY.

15 MS. GAROFALO:

16 Q OKAY. WOULD IT BE POSSIBLE FOR SOMEBODY TO --
17 STRIKE THAT.

18 WORKING AT -- HOW LONG DID IT TAKE YOU AFTER YOU
19 BEGAN WORKING WITH MR. DAVID TO FIGURE OUT WHAT KIND OF
20 ENVIRONMENT YOU WERE WORKING IN?

21 A DAY ONE. AND HE WASN'T EVEN THERE FOR THE FIRST
22 THREE MONTHS THAT I WORKED THERE.

23 Q SO EVEN WHEN MR. DAVID WASN'T IN THE OFFICE, THE
24 ENVIRONMENT WAS NOT YOUR TYPICAL CORPORATE OFFICE; IS
25 THAT CORRECT?

26 A YES.

27 MS. GAROFALO: OKAY. I HAVE NO FURTHER
28 QUESTIONS.

1 HON. T.A. GREEN: CROSS.

2

3

CROSS EXAMINATION

4

MR. GOLDBERG:

5

Q WHEN YOU WENT TO WORK THERE, WERE YOU WORKING ON
6 BATTLECAM?

7

A YES.

8

Q SO YOU WORKED THERE ON BATTLECAM FROM DAY ONE;
9 CORRECT?

10

A CORRECT.

11

Q WHEN MS. REEVES WENT TO WORK INITIALLY IN THE
12 INITIAL PERIOD OF HER EMPLOYMENT, DO YOU KNOW WHAT SHE
13 WAS WORKING ON?

14

A DO I KNOW WHAT SHE WAS WORKING ON?

15

Q YEAH.

16

A SHE WAS SUPPOSED TO BE A WRITER.

17

Q YEAH.

18

A BUT THESE SHOWS AREN'T SHOWS THAT YOU USUALLY
19 WRITE FOR, SO I DON'T KNOW WHAT SHE DID.

20

Q DO YOU KNOW WHETHER SHE WAS WORKING ON BATTLECAM
21 LIVE? I'M SORRY, ON BEVERLY HILLS LIVE DURING THAT
22 INITIAL PERIOD?

23

A DID I KNOW HER, DID YOU SAY?

24

Q NO.

25

DID YOU KNOW THAT SHE WAS WORKING ON A SHOW
26 CALLED BEVERLY HILLS LIVE?

27

A YES, I DID.

28

Q AND WERE YOU AWARE OF THE FACT THAT HER OFFICE

1 WAS ACROSS THE STREET INITIALLY WHEN SHE STARTED WORKING
2 THERE?

3 A OKAY. NO, I DIDN'T -- I DIDN'T KNOW SHE EVEN HAD
4 AN OFFICE. THERE WAS DESKS THERE TO SIT AT.

5 Q OKAY. NOW --

6 A I'M PRETTY SURE SHE WASN'T HANDED, LIKE, THE ONE
7 BIG OFFICE IN THAT OFFICE ACROSS THE STREET.

8 Q NOW, YOU WERE -- THAT POSTER THAT WE LOOKED AT,
9 DID YOU EVER HAVE AN OFFICE DOWNSTAIRS?

10 A I HAD AN OFFICE UPSTAIRS.

11 Q DID YOU EVER HAVE AN OFFICE DOWNSTAIRS?

12 A I HAD AN OFFICE UPSTAIRS.

13 Q OKAY. I JUST ASKED IF YOU EVER HAD AN OFFICE
14 OTHER THAN UPSTAIRS.

15 A I WOULDN'T CALL IT AN OFFICE. I WOULD SAY I HAVE
16 A DESK.

17 Q DOWNSTAIRS?

18 A CORRECT.

19 Q DURING WHAT PERIOD OF TIME?

20 A 2012 TO -- TILL WE GOT THE OFFICES UPSTAIRS IN
21 2014, I BELIEVE, IT WAS OR '15.

22 Q OKAY. OKAY.

23 NOW, AFTER YOU TOOK THAT POSTER YOU TOLD US YOU
24 TOOK DOWN, DID YOU KEEP IT AFTER YOU TOOK IT DOWN?

25 A I DON'T KNOW. MAYBE IN A FILING CABINET.

26 Q SO YOUR BEST TESTIMONY IS YOU TOOK IT DOWN IN
27 2014; IS THAT RIGHT?

28 A SURE.

1 Q OKAY. NOW, WITH REGARD TO -- I WANT TO SHOW
2 YOU --

3 A SIR, ARE YOU NOW TELLING ME THAT SHE WAS GOING
4 AROUND IN MY DRAWERS?

5 Q EXCUSE ME. EXCUSE ME. EXCUSE ME.
6 THERE'S NO QUESTION PENDING, YOUR HONOR.

7 HON. T.A. GREEN: RIGHT.

8 NEXT QUESTION.

9 MR. GOLDBERG:

10 Q NOW, I'D LIKE YOU TO TAKE A LOOK AT EXHIBIT 112,
11 WHICH HAS ALREADY BEEN ADMITTED INTO EVIDENCE.
12 AND IF WE CAN PUT IT UP ON THE SCREEN.
13 YOU CAN SEE ON IT THE SCREEN IN FRONT OF YOU, IF THAT'S
14 OKAY.

15 THIS IS A E-MAIL THAT WAS SENT OUT ON AUGUST 26,
16 2016, REGARDING THE NEW SHOW BATTLECAM LIVE AND YOU'RE
17 COPIED ON THE E-MAIL ON THE TOP.

18 DO YOU SEE THAT?

19 A I DO.

20 Q DO YOU RECALL RECEIVING THIS E-MAIL?

21 A DID I RECEIVE THIS E-MAIL?

22 Q YES.

23 A YEAH, AUGUST 26TH OF 2016.

24 Q RIGHT.

25 AND DO YOU RECALL THAT -- AT THE TIME THAT YOU
26 RECEIVED THIS, DID YOU READ IT?

27 A POSSIBLY.

28 Q OKAY. WHAT WAS YOUR CONNECTION WITH THE SHOW

1 BATTLECAM LIVE?

2 A NOT TOO MUCH, I JUST MANAGED THE STUDIO.

3 Q WHAT DOES THAT MEAN EXACTLY?

4 A WHAT WAS WHAT?

5 Q WHAT DOES IT MEAN TO "MANAGE THE STUDIO"?

6 A I WAS ABLE TO LOCK AND UNLOCK THE DOORS. I MADE
7 PEOPLE'S SCHEDULES THAT RAN ALL THE MACHINES THAT MADE
8 THE SHOWS POSSIBLE.

9 Q AS I UNDERSTAND IT, THE SHOW WAS BEING FILMED ON
10 THE BALCONY?

11 A THAT -- NO.

12 Q AND WHERE WAS IT BEING FILMED?

13 A OUT IN OUR STUDIO DOWNSTAIRS AND OUTSIDE ON THE
14 STREET.

15 Q ON THE STUDIO DOWNSTAIRS WHERE?

16 A AND ALSO OUTSIDE ON THE STREET, THEY WOULD LIKE
17 TO INVOLVE PEOPLE THAT WALKED BY.

18 Q SO YOUR RECOLLECTION IS BATTLECAM LIVE WAS NEVER
19 BEING SHOT --

20 A ARE YOU TALKING ABOUT BATTLECAM LIVE OR BEVERLY
21 HILLS LIVE BECAUSE YOU'RE TALKING ABOUT TWO DIFFERENT
22 THINGS?

23 Q I'M TALKING ABOUT BATTLECAM LIVE.

24 A SO THE SECOND TIME THAT SHE WORKED FOR ALKI?

25 Q WELL, ACTUALLY, IT'S -- WELL, WE'LL GET INTO WHAT
26 TIME IT WAS. I'M JUST ASKING BATTLECAM LIVE.

27 A SO BATTLECAM LIVE WAS ON THE BALCONY UPSTAIRS.

28 Q OKAY. THAT WAS MY QUESTION.

1 AND WHAT WAS YOUR RELATIONSHIP TO THAT SHOW, IF
2 YOU COULD TELL ME?

3 A I HOSTED A SHOW ON IT.

4 Q OKAY. SO DO YOU RECALL HOW MANY HOURS THAT SHOW
5 RAN A DAY?

6 A THERE'S PROBABLY ABOUT THREE OR FOUR DIFFERENT
7 PEOPLE, I THINK, THAT HOSTED SHOWS DURING THAT DAY.

8 Q OKAY. SO -- AND DO YOU RECALL WHAT TIME OF DAY
9 THAT SHOW WAS SHOWN ON THE AIR?

10 A IN THE EVENING, AND THEN IN THE LATER PART OF THE
11 WORKDAY.

12 Q LIKE 2:00 TO 7:00? DOES THAT SOUND RIGHT?

13 A I'M NOT SURE. BUT SURE.

14 Q OKAY.

15 NOW, THE E-MAIL I JUST SHOWED YOU OUTLINED SORT
16 OF A -- SOME RULES IN TERMS OF CENSORSHIP REGARDING THIS
17 NEW SHOW.

18 A UM-HMM.

19 Q DO YOU KNOW WHETHER THOSE RULES WERE FOLLOWED?
20 AND YOU'RE FREE TO READ IT BEFORE YOU ANSWER.

21 A OKAY. SO YOU'RE NOT ALLOWED TO SAY SWEAR WORDS
22 OR LICK --

23 Q I'M SORRY?

24 A I'M READING WHAT IT SAYS. YEAH, OKAY.

25 Q OKAY.

26 SO DO YOU KNOW WHETHER OR NOT WHAT WAS OUTLINED IN THIS
27 E-MAIL WAS ACTUALLY FOLLOWED WHEN THE SHOW WAS BEING
28 AIRED?

1 A I'M NOT SURE.

2 Q OKAY. WELL, LET'S TAKE A LOOK AT EXHIBIT 196.

3 I DON'T KNOW IF THAT'S IN EVIDENCE OR NOT.

4 HON. T.A. GREEN: I'M SORRY, IT'S IN EVIDENCE?

5 MR. GOLDBERG: I'M NOT SURE.

6 MS. LEAL: IT'S NOT.

7 MR. GOLDBERG: OKAY. I'M GOING TO ASK THAT

8 EXHIBIT 196 BE ACCEPTED INTO EVIDENCE.

9 HON. T.A. GREEN: ANY OBJECTIONS?

10 MS. GAROFALO: NO OBJECTION, YOUR HONOR.

11 HON. T.A. GREEN: IT WILL BE RECEIVED.

12

13 (EXHIBIT 196 ADMITTED INTO EVIDENCE)

14

15 MR. GOLDBERG:

16 Q NOW, IT'S AN E-MAIL ON SEPTEMBER 12TH, 2016, FROM

17 ARI SCOTT AND YOU'RE COPIED ON THE E-MAIL. AND IT SETS

18 FORTH TOPICS FOR THE SHOW TOMORROW, THAT WOULD BE

19 SEPTEMBER 13TH, OKAY?

20 A OKAY.

21 Q DO YOU SEE THAT?

22 A I DO SEE THAT.

23 Q OKAY.

24 NOW, IF WE GO TO THE NEXT PAGE, IT TALKS ABOUT

25 NEWS -- VARIOUS NEWS ITEMS THAT ARE GOING TO BE

26 DISCUSSED, POLITICS.

27 DO YOU SEE THAT AT THE BOTTOM?

28 A DO I READ, YEAH, I -- I SEE THAT.

1 Q AND THEN ON THE THIRD PAGE, 196.3, IT TALKS ABOUT
2 POP CULTURE.

3 A YEAH.

4 Q ON PAGE 4, IT TALKS ABOUT SCIENCE AND TECH; IS
5 THAT CORRECT?

6 A OKAY.

7 Q AND THEN IT TALKS ABOUT HEALTH; RIGHT? IS
8 THAT... AND THEN UNDER -- ON PAGE 5, IT TALKS ABOUT
9 WEIRD.

10 A OKAY.

11 Q AN 18-YEAR-OLD WOMAN GETS A TATTOOED EYE -- OR IN
12 A DRINK, GETS HIS MONEY BACK FOR THE DRINK.

13 A YEAH.

14 Q IS THIS, GENERALLY SPEAKING, IF YOU LOOK AT THE
15 -- WHAT'S IN THIS SCRIPT, SO TO SPEAK, OR THE TOPICS, IS
16 THIS GENERALLY THE FORMAT FOR THAT SHOW?

17 A I WASN'T A WRITER ON THE SHOW, SO I WOULDN'T
18 KNOW.

19 Q WELL, YOU WERE COPIED ON WHAT WOULD BE THE TOPICS
20 FOR THE SHOW.

21 DOES THAT SUGGEST THAT THESE ARE THE TOPICS THAT
22 WERE DISCUSSED ON THE SHOW?

23 A I'M GUESSING THAT THEY WERE A LIST OF TOPICS THAT
24 THE HOSTS COULD PICK WHAT THEY WANTED TO TALK ABOUT.

25 Q ALL RIGHT. THAT'S FINE.

26 MR. GOLDBERG: LET'S LOOK AT SEPTEMBER 13TH, 197.
27 ASK THAT IT BE ADMITTED INTO EVIDENCE.

28 HON. T.A. GREEN: ANY OBJECTION?

1 MS. GAROFALO: I'M SORRY, YOUR HONOR?

2 MR. GOLDBERG: 197.

3 MS. GAROFALO: GIVE US A MOMENT, YOUR HONOR.

4 NO OBJECTION.

5 HON. T.A. GREEN: IT WILL BE RECEIVED.

6

7 (EXHIBIT 197 ADMITTED INTO EVIDENCE)

8

9 MR. GOLDBERG:

10 Q AND AGAIN, THIS IS AN E-MAIL TO A NUMBER OF
11 INDIVIDUALS. I BELIEVE THAT YOU'RE -- JUST MAKE SURE,
12 YEAH, YOU'RE COPIED ON IT.

13 DO YOU SEE THAT?

14 A I WAS COPIED ON, YEAH, I WAS COPIED ON LOTS OF
15 E-MAILS OVER FIVE YEARS.

16 Q BUT YOU WERE COPIED ON THIS PRESUMABLY BECAUSE
17 YOU WERE ONE OF THE HOSTS OF THE SHOW; CORRECT?

18 A YEAH, I HAD A SHOW, BUT IT WASN'T -- WE DIDN'T
19 TALK ABOUT THIS STUFF, WE HAD OUR OWN CONTENT.

20 Q BUT YOU WERE A HOST ON BATTLECAM LIVE OR ON SOME
21 OTHER SHOW?

22 A IT WAS CALLED BATTLECAM LIVE AND THERE WAS SHOWS
23 UNDER THAT THAT DIFFERENT PEOPLE HOSTED.

24 Q OKAY. WELL, MY QUESTION IS, AS I UNDERSTAND IT,
25 THERE WAS FIVE HOURS OF TELEVISION TIME TO BE FILLED.

26 A UM-HMM.

27 Q WERE YOU ONE OF THE HOSTS ON DURING THOSE FIVE
28 HOURS?

1 A YES.

2 Q AND WASN'T THIS -- THE E-MAILS FROM MARY SCOTT,
3 WEREN'T THOSE THE TOPICS THAT WERE GOING TO BE DISCUSSED
4 ON THE SHOW?

5 A AND IF YOU HAD YOUR SHOW THAT YOU COULD COME UP
6 WITH YOUR OWN TOPICS AND DIDN'T NEED TO BE FED THIS KIND
7 OF STUFF, THEN YOU COULD TALK ABOUT WHATEVER YOU WANTED.

8 Q OKAY. SO YOU DIDN'T -- YOU WEREN'T LIMITED, IS
9 WHAT YOU'RE SAYING, TO WHAT'S IN THIS; CORRECT?

10 A CORRECT.

11 Q AND THEN WHAT YOU'RE SAYING, THESE WERE
12 SUGGESTIONS OF THE TYPE OF PROGRAMMING THAT WAS GOING TO
13 BE GIVEN; CORRECT?

14 A CORRECT.

15 Q AND YOU, AS THE HOST, COULD DECIDE TO TALK ABOUT
16 OTHER THINGS; CORRECT?

17 A UM-HMM.

18 Q ALL RIGHT.

19 AND THEN TAKE A LOOK, IF YOU WOULD, I'M GOING TO
20 SHOW YOU ANOTHER WRITING.

21 TAKE A LOOK AT 198.

22 AND I'LL ASK THAT EXHIBIT 198 BE ADMITTED INTO
23 EVIDENCE.

24 HON. T.A. GREEN: ANY OBJECTION TO 198?

25 MS. GAROFALO: NO OBJECTION.

26 HON. T.A. GREEN: IT WILL BE RECEIVED.

27

28 (EXHIBIT 198 ADMITTED INTO EVIDENCE)

1 MR. GOLDBERG:

2 Q LET'S LOOK AT THE COVER, THOUGH. IT TALKS ABOUT
3 THE CALL SHEET FOR THE BATTLECAM SHOW SEPTEMBER 14TH.

4 DO YOU SEE THAT?

5 A YES.

6 Q OKAY. AND ON PAGE 2, WHERE IT TALKS ABOUT -- IT
7 HAS YOUR NAME AND IT SAYS YOU'RE A MEDIA MANAGER.

8 DO YOU SEE THAT?

9 A CORRECT.

10 Q AND IT SAYS YOU'RE SUPPOSED TO BE THERE AT
11 1:00 O'CLOCK IN THE AFTERNOON; RIGHT?

12 A OKAY.

13 Q IS THAT -- NO, I'M ASKING YOU.

14 A YEAH, THAT'S WHAT IT SAYS, YEAH.

15 Q OKAY. SO DID YOU HAVE A DUAL ROLE ON THAT SHOW,
16 ONE BEING TO BE A HOST AND ALSO A MEDIA MANAGER?

17 A YEP.

18 Q OKAY. AND WHAT DOES IT MEAN TO BE THE MEDIA
19 MANAGER ON THE SHOW?

20 A IF SOMEBODY WAS TALKING ABOUT A SPECIFIC TOPIC,
21 WE WOULD GO ON A COMPUTER AND GOOGLE SEARCH. IF THEY
22 ARE TALKING ABOUT A NEW SODA THAT CAME UP, YOU WOULD
23 PULL UP A PICTURE OF A SODA AND IT WOULD BE SHOWN ON THE
24 SCREEN BEHIND THEM.

25 Q SO YOU WOULD YOU WORK WITH THE HOSTS
26 ESSENTIALLY --

27 A UM-HMM.

28 HON. T.A. GREEN: IS THAT A "YES"?

1 THE WITNESS: CORRECT.

2 MR. GOLDBERG:

3 Q -- IN TERMS OF HELPING -- IF THEY WERE TALKING
4 ABOUT SOMETHING, YOU WOULD HELP BRING IN IMAGES RELATED
5 TO THAT TOPIC?

6 A YES.

7 Q OKAY. AND IS THAT SOMETHING YOU DID ON A REGULAR
8 BASIS AS THE MEDIA MANAGER ON THAT SHOW?

9 A NO, I WOULD STAND IN AND DO IT FOR PEOPLE, IF
10 THEY COULDN'T COME.

11 Q OKAY. AND LOOKING AT THIS CALL TIME, DOES THAT
12 SUGGEST TO YOU THAT THIS SHOW WAS SHOWN IN THE
13 AFTERNOON?

14 A YES.

15 Q OKAY. NOW, FINALLY TAKE A LOOK AT EXHIBIT 199.

16 HON. T.A. GREEN: AND 199 IS IN EVIDENCE?

17 MS. LEAL: NO.

18 MS. GAROFALO: NO OBJECTION, YOUR HONOR.

19 HON. T.A. GREEN: IT WILL BE RECEIVED.

20

21 (EXHIBIT 199 ADMITTED INTO EVIDENCE)

22

23 MR. GOLDBERG:

24 Q NOW, THIS ONE ASKS THE PEOPLE THAT RECEIVED THE
25 E-MAIL TO SORT OF MAKE SOME CHOICES ABOUT WHAT TOPICS
26 THEY WANTED TO TALK ABOUT; RIGHT?

27 A YES.

28 Q DO YOU RECALL SELECTING ANY OF THESE TOPICS?

1 A MYSELF?

2 Q YEAH.

3 A NO, I DON'T.

4 Q OKAY. WELL, WOULD YOU HAVE SELECTED A TOPIC AT
5 THAT TIME?

6 MS. GAROFALO: OBJECTION.

7 MR. GOLDBERG:

8 Q IF YOU KNOW.

9 HON. T.A. GREEN: I'M SORRY?

10 MS. GAROFALO: LACKS FOUNDATION. OBJECTION.

11 HON. T.A. GREEN: SUSTAINED.

12 MR. GOLDBERG:

13 Q WOULD YOU HAVE SELECTED -- IF THIS WAS SENT TO
14 YOU AT THAT TIME, WOULD YOU RECEIVED --

15 A IF I COULDN'T COME UP WITH MY OWN CONTENT AND
16 NEEDED SOMETHING?

17 MS. GAROFALO: YOUR HONOR, THERE WAS AN
18 OBJECTION.

19 THE WITNESS: I DON'T KNOW HOW THIS HAS ANYTHING
20 TO DO WITH WHAT -- I DROVE TWO HOURS TO GO OVER OLD
21 SCHEDULES?

22 HON. T.A. GREEN: GUYS. I'LL SUSTAIN THE
23 OBJECTION.

24 MR. GOLDBERG:

25 Q NOW, FINALLY, LET ME LOOK AT -- BY THE WAY, DO
26 YOU KNOW WHAT DATE MS. REEVES -- WHAT DATE SHE LEFT THE
27 ORGANIZATION?

28 A I COULDN'T HEAR YOU.

1 Q DO YOU KNOW THE DATES THAT MS. REEVES WORKED?

2 A NO. I DID NOT ASSOCIATE MYSELF WITH HER.

3 Q OKAY. THE -- LET'S GO BACK FOR JUST A MOMENT.

4 YOU WERE ONE OF THE PRODUCERS ON LORD OF THE
5 FREAKS, WERE YOU NOT?

6 A YES, I WAS.

7 Q AND ALKI DAVID GAVE YOU THAT OPPORTUNITY TO BE A
8 PRODUCER ON LORD OF THE FREAKS?

9 A THE DIRECTOR.

10 Q UM-HMM.

11 AND WHAT -- WHAT DID -- WHAT WAS -- WHAT DID THAT
12 MEAN TO BE A PRODUCER ON LORD OF THE FREAKS?

13 A HELP GET THE TALENT AND INTERVIEWS THAT THEY
14 NEEDED, HELP THEM LOOK THROUGH OLD VIDEOS TO FIND
15 CONTENT FOR THE SHOW AND PUT IT IN THE MOVIE.

16 Q ALL RIGHT.

17 NOW, WHEN PEOPLE WERE BEING FILMED AT THE COMPANY
18 OFFICES, WOULD YOU GET THEIR CONSENT TO BEING FILMED?

19 A WE WOULD HAVE PEOPLE SIGN CONSENT AND WE ALSO HAD
20 SIGNS SAYING THAT IN EVERY DOOR IN THE OFFICE, SAYING
21 THE MINUTE YOU STEP INSIDE THIS ROOM, YOU COULD BE ON
22 TELEVISION.

23 Q YEAH.

24 A AND THAT YOU'RE CONSENTING TO BE ON TELEVISION.

25 Q WHICH DOORS -- WHICH DOORS WERE THOSE ON?

26 A EVERY DOOR THAT ENTERED THE BUILDING THAT WE
27 WORKED IN.

28 Q YEAH.

1 SO EVERY DOOR IN WHAT BUILDING?

2 A IN WHAT BUILDING?

3 Q YEAH.

4 A 342 NORTH CANON DRIVE.

5 Q SO THERE'S A SIGN ON THE FRONT DOOR?

6 A ON -- IN -- INSIDE THE BUILDING, OUTSIDE THE BOOK
7 DOOR WHERE PEOPLE WOULD BE LET IN, THERE WAS A SIGN THAT
8 SAID -- ANYWHERE IN THE UNIVERSE THIS MAY BE SHOWN, SO
9 YOU'RE GOING TO BE FILMED.

10 Q YEAH.

11 SO YOU'RE GOING TO BE FILMED WHEN YOU STEP INTO
12 THE BUILDING; CORRECT?

13 A CORRECT.

14 Q WHAT ABOUT -- BUT YOU SAID THAT PEOPLE WERE ALSO
15 ASKED TO SIGN CONSENT FORMS?

16 A YEAH, WE COVERED OUR BUTTS, YEAH.

17 Q WHY -- WHY'D YOU DO THAT?

18 A BECAUSE WE HAVE TO BECAUSE OTHERWISE WE END UP IN
19 THE COURT LIKE THIS GETTING SUED OVER SOMETHING STUPID.

20 Q OH, SO IT'S STUPID THAT SOMEBODY --

21 A I THINK WHAT SHE'S DOING IS IT STUPID, YES, I DO.

22 Q YOU THINK IT'S STUPID.

23 DO YOU KNOW WHETHER OR NOT -- YOU TALKED ABOUT
24 THE MAN-GINA AND THERE'S SOMETHING ABOUT A HOLOGRAM.
25 DO YOU KNOW WHETHER OR NOT MR. DAVID EVER SHOWED THE
26 MAN-GINA LIVE AT THE -- AT --

27 A I'M NOT SURE IF HE EVER SHOWED HIS MAN-GINA LIVE.

28 Q WELL, DID YOU EVER SEE HIS MAN-GINA LIVE?

1 A YES, I WORKED IN THE STUDIO WHEN WE SHOT HIS --
2 WHEN WE SHOT HIS HOLOGRAM, YEAH.

3 Q DID YOU EVER SEE HIM DO THAT -- OUTSIDE OF IN THE
4 STUDIO, DID YOU EVER SEE HIM SHOW THE MAN-GINA?

5 A NOT IN OUR OFFICE, NO.

6 Q NOW, YOU SAID THAT -- DID HE EVER PULL HIS PANTS
7 DOWN IN FRONT OF YOU?

8 A TO DO THE MAN-GINA, I GUESS, BUT...

9 Q WELL, ASIDE -- I'M NOT TALKING ABOUT THE
10 MAN-GINA.

11 A NO.

12 Q I'M TALKING ABOUT OUTSIDE THE MAN-GINA, DID MR.
13 DAVID, IN ALL THE TIME THAT YOU WORKED WITH HIM EVER
14 PULL HIS PANTS DOWN?

15 A AND HIS UNDERWEAR AS WELL OR JUST HIS PANTS?

16 Q JUST HIS PANTS.

17 A MAYBE. NO -- I'VE NEVER --

18 Q UM-HMM.

19 A -- NOTICED HIM EVER WALKING AROUND NAKED OR WITH
20 HIS PANTS DOWN OR...

21 Q ALL RIGHT. YEAH.

22 A THAT'S NO.

23 Q DID MR. DAVID EVER TAKE YOUR FINGER AND PUT IT IN
24 HIS MOUTH?

25 A NO.

26 Q HE NEVER DID THAT?

27 A DID HE EVER PUT MY FINGER IN HIS MOUTH?

28 Q YEAH.

1 A NOT THAT I CAN RECALL.

2 Q DID HE EVER ASK YOU TO HAVE SEX WITH HIM?

3 A NO.

4 Q DID HE EVER ASK YOU TO GO AWAY TO A FOREIGN
5 COUNTRY WITH HIM IN ORDER TO HAVE SEX?

6 A NO.

7 Q DID MR. DAVID EVER COME UP TO THE OFFICE THAT YOU
8 HAD, PLACE HIS CHEST, YOU KNOW, OPEN HIS SHIRT, PLACE
9 HIS CHEST, NIPPLES AGAINST THE WINDOW -- AGAINST THE
10 GLASS IN YOUR PRESENCE?

11 A NO.

12 Q HE NEVER DID THAT?

13 DID MR. DAVID EVER PUT HIS HANDS AROUND YOUR
14 NECK?

15 A MAYBE HIM AND I JOKING TOGETHER, WE'RE, LIKE, TO
16 EACH OTHER BECAUSE HE WOULD DRIVE ME NUTS SOMETIMES AND
17 HE WOULD --

18 Q YEAH.

19 A -- JOKE AROUND.

20 Q BUT OTHER THAN YOU TWO JOKING AROUND TOGETHER
21 WHERE YOU WOULD EACH PUT YOUR HANDS, DID HE EVER COME UP
22 TO YOU AND SQUEEZE YOUR NECK?

23 A NO, NOT -- NOT IN A NON-JOKING MANNER.

24 Q YEAH.

25 WELL, DID HE DO IT TO YOU IN A JOKING MANNER?

26 A YEAH. I WOULD DO IT RIGHT BACK TO HIM.

27 Q AND HOW OFTEN DID THAT HAPPEN?

28 A ALKI IS LIKE FAMILY TO ME. WE JOKED AROUND ALL

1 THE TIME. EVERYBODY IN THE OFFICE JOKED AROUND UNTIL --
2 UNTIL THEY GET FIRED AND THEN THEY HAVE AN ISSUE.

3 Q YEAH.

4 A THAT'S WHAT THIS WHOLE THING IS LOOKING FOR A
5 QUICK BUCK.

6 Q YEAH.

7 SO THE -- IN TERMS OF MR. DAVID'S BEHAVIOR AT
8 WORK -- BY THE WAY, DID HE EVER TALK TO YOU ABOUT A RAPE
9 ROOM?

10 A NO.

11 Q DID YOU EVER HEAR THE TERM "RAPE ROOM"?

12 A I'VE NEVER HEARD THE TERM RAPE ROOM, NO.

13 Q DID HE EVER TELL YOU THAT HE WANTED TO GO GET
14 SOME TIES FOR HIS RAPE ROOM?

15 A NO.

16 Q YOU NEVER HEARD THAT; CORRECT?

17 A NO.

18 Q YEAH.

19 DID MR. DAVID EVER TELL YOU THAT -- STRIKE THAT.

20 DID HE -- DID MR. DAVID EVER TRY TO KISS YOU?

21 A NO.

22 Q DID HE EVER SHOW -- DID MR. DAVID EVER TRY TO SEE
23 ANY INTIMATE PARTS OF YOUR BODY?

24 A NO.

25 Q UM-HMM.

26 NOW, BY THE WAY, LET'S SEE -- I DON'T KNOW THE
27 DATE OF THIS.

28 MS. GAROFALO: OBJECTION, YOUR HONOR.

1 MR. GOLDBERG: WELL, I'M NOT -- ALL I'M GOING TO
2 DO IS SHOW IT TO HER AND ASK HER TO IDENTIFY IT.

3 MS. GAROFALO: MY OBJECTION IS THAT YET AGAIN WE
4 HAVE A DOCUMENT THAT HAS NOT BEEN PRODUCED, THAT IS NOT
5 ON THE WITNESS LIST --

6 HON. T.A. GREEN: OKAY. WE'LL TAKE OUR AFTERNOON
7 RECESS.

8 THE WITNESS: THEY CAN DO IT, I DON'T CARE. THEY
9 CAN BRING ME WHATEVER THEY WANT TO TRY TO SHOW ME.

10 HON. T.A. GREEN: OKAY. THAT'S -- THERE'S AN
11 OBJECTION AND THAT MEANS THAT I'VE GOT TO MAKE A RULING.

12 THE WITNESS: IT'S A PICTURE OFF MY INSTAGRAM,
13 WHICH I SEE...

14 HON. T.A. GREEN: OKAY. MY TURN.

15 THE WITNESS: ALL RIGHT.

16 HON. T.A. GREEN: ALL RIGHT. LET'S TAKE OUR NOON
17 RECESS. WE'LL RECONVENE AT 1:30. I HAVE A BRIEF MATTER
18 AT 1:30, IT BETTER BE BRIEF, AND THEN WE'LL PROCEED.
19 THANK YOU. HAVE A GREAT, LIGHT LUNCH. THANK YOU.

20 MR. GOLDBERG: THANK YOU, YOUR HONOR.

21 HON. T.A. GREEN: ALL RIGHT. JURY IS NOT
22 PRESENT.

23 WHAT'S THE OBJECTION?

24 MS. GAROFALO: ACTUALLY, NOW THAT I'VE LOOKED AT
25 IT, IT HAS SEVERAL THINGS.
26 THE FIRST IS --

27 HON. T.A. GREEN: WELL, HANG ON, HANG ON.

28 MS. GAROFALO: -- NOT PRODUCED, NOT ON THE

1 EXHIBIT LIST, LONG STRING OF DOCUMENTS. MS. BOTTO HAS
2 BEEN ON THE WITNESS LIST. CERTAINLY THIS COULD HAVE
3 BEEN DISCLOSED. IT IS ALSO CUT OFF. I DON'T KNOW IF IT
4 WAS INTENTIONALLY --

5 HON. T.A. GREEN: WELL, WHAT IS IT?

6 MS. GAROFALO: IT'S SOME -- IT LOOKS -- IT'S NOT
7 DATED. IT LOOKS LIKE SOMETHING THAT MS. BOTTO MAY HAVE
8 POSTED.

9 THE WITNESS: IT'S A PICTURE FROM THE MEDIA
10 PREMIERE.

11 HON. T.A. GREEN: OKAY. THANK YOU. THANK YOU,
12 GUYS. MY TURN, RIGHT?

13 MS. GAROFALO: YEAH, WE DON'T KNOW WHAT'S CUT OFF
14 AT THE BOTTOM. NOT DATED.

15 MS. LEAL: THE REASON THEY ARE ON TWO PAGES IS
16 BECAUSE IT DIDN'T FIT ON ONE PAGE, YOUR HONOR, BUT THE
17 EXHIBIT WE HAVE IS ALL ON ONE PAGE THAT WOULD BE
18 DISPLAYED.

19 MS. GAROFALO: AND RELEVANCE.

20 MR. GOLDBERG: WELL, FIRST OF ALL, MAY I ASK THE
21 WITNESS TO STEP OUTSIDE, YOUR HONOR, WHILE WE GO OVER
22 THE OBJECTIONS?

23 HON. T.A. GREEN: YEAH. MS. JOHNSON, WILL YOU
24 WAIT OUTSIDE FOR US?

25 MR. DAVID: HE'S SO PATHETIC THIS GUY.

26 MR. GOLDBERG: THIS IS IMPEACHMENT AND I'M
27 ENTITLED TO ASK HER ABOUT IT.

28 HON. T.A. GREEN: WHAT'S -- WHAT'S IMPEACHING

1 ABOUT IT?

2 MR. GOLDBERG: IT'S IMPEACHING BECAUSE SHE
3 TESTIFIED THAT THAT -- ABOUT 127 WAS UP FOR A WEEK IN
4 2014, I BELIEVE THIS WAS MUCH LATER.

5 MS. GAROFALO: THERE'S NO DATE ON IT, YOUR HONOR.

6 MR. GOLDBERG: HOLD ON A SECOND.
7 SHE CAN TELL US WHEN IT WAS AND I'M ENTITLED TO ASK HER
8 ABOUT IT AND SHE'S TALKING ABOUT ME AND MY PARTNER IN
9 CRIME AND BUSINESS PARTNER AT FILMON TV HR COMPANY AND
10 HER-ASS AND SHE'S, YOU KNOW, SHE'S POSTING THIS AT A
11 MUCH LATER DATE AND I THINK IT'S --

12 HON. T.A. GREEN: WELL, WHAT DATE?

13 MS. GAROFALO: WHAT DATE? THERE'S NO DATE ON IT.

14 MR. GOLDBERG: I CAN ASK HER ABOUT THAT, YOUR
15 HONOR. THAT'S ALL I'M SAYING.

16 MS. GAROFALO: YOUR HONOR, THIS WAS APPARENTLY
17 USED AS AN EXHIBIT IN ONE OF MS. BLOOM'S CASES. THIS IS
18 ONE OF MULTIPLE EXHIBITS WE'VE BEEN HANDED THAT
19 APPARENTLY HAVE BEEN HANDED OVER BY THE COUNSEL WITH
20 WHOM THEY ARE NOT COMMUNICATING ALLEGEDLY.

21 MR. GOLDBERG: I DIDN'T SAY WE'RE NOT
22 COMMUNICATING. I SAID WE DON'T -- WE ARE NOT...

23 HON. T.A. GREEN: GUYS, I'M STILL UP HERE. I
24 HAVEN'T MOVED, OKAY.

25 MR. GOLDBERG: ALL RIGHT. THE POINT IS, YOUR
26 HONOR, ALL I WANT TO DO IS SHOW IT TO HER, ASK HER IF
27 SHE COULD TELL US WHEN THIS WAS.

28 HON. T.A. GREEN: I DON'T SEE WHAT THE PROBLEM

1 IS. I MEAN, IT'S...

2 MS. GAROFALO: WELL, HERE'S THE PROBLEM. THIS IS
3 BEING STRUNG OUT, WE NOW HAVE THEIR PSYCHOLOGIST FOR AN
4 EXTREMELY LIMITED PERIOD OF TIME. WE COULDN'T GET HER
5 FOR DEPOSITION, SHE ONLY HAS LIMITED TIME, WE ONLY GOT
6 CUT A VERY SHORT TIME THE OTHER DAY. NOW WE WERE
7 CONFINED TO A COUPLE OF HOURS, THAT'S BEEN SHUT DOWN FOR
8 NO FAULT OF MR. GOLDBERG, AND WE'RE GOING TO HEAR THAT
9 SHE CANNOT COME BACK AND MY EXAMINATION --

10 HON. T.A. GREEN: OH, SHE'LL COME BACK. I'LL
11 ORDER HER TO COME BACK.

12 MS. GAROFALO: -- OF AN IMPORTANT WITNESS,
13 DAMAGES IS GOING TO BE TRUNCATED BECAUSE NOW WE'RE GOING
14 TO BE TALKING ABOUT I DON'T KNOW WHAT.

15 HON. T.A. GREEN: OKAY. WELL, YOU KNOW, I CAN
16 ALWAYS USE THE O WORD AND ORDER PEOPLE BACK. I MEAN,
17 IT'S THE...

18 MS. GAROFALO: THEN IF YOU WILL ORDER DR. MEYER
19 BACK IF WE'RE NOT FINISHED TODAY AND I WILL DO MY BEST
20 TO FINISH, THEN GO AHEAD, THEY CAN HAVE A BALL WITH
21 THIS.

22 HON. T.A. GREEN: WELL, SOMEBODY IS PAYING FOR
23 THE DOCTOR; RIGHT?

24 MR. GOLDBERG: SO FAR NOBODY HAS PAID FOR THE
25 DOCTOR.

26 HON. T.A. GREEN: DOES SHE KNOW THAT?

27 MR. GOLDBERG: I THINK SHE HOPES TO GET PAID.

28 HON. T.A. GREEN: OH, OKAY. WELL, MOVING ON.

1 I'LL OVERRULE THE OBJECTION ON THIS.

2 OKAY, GUYS, WE -- AND I -- I APOLOGIZE, I TOLD
3 YOU I HAVE THE RARE PRIVILEGE OF GOING TO AN EVENT IN LA
4 QUINTA THAT I HAVE TO GET TO.

5 (OFF-RECORD COMMENTS)

6 MS. GAROFALO: ANYWAY, YOUR HONOR, CAN WE THEN
7 HAVE DR. MEYER ORDERED BACK, I MEAN, THIS IS --

8 HON. T.A. GREEN: I WILL. OKAY. NO, I CAN DO
9 THAT.

10 MR. GOLDBERG: MAYBE SHE'LL FINISH.

11 HON. T.A. GREEN: OKAY, GUYS.

12 MS. GAROFALO: IF I FINISH, HE DOESN'T HAVE TO
13 ORDER HER BACK, HOW IS THAT?

14 MR. GOLDBERG: I DON'T KNOW.

15 HON. T.A. GREEN: ALL RIGHT. PEOPLE, CAN I HELP
16 YOU FURTHER, PLAINTIFF?

17 MR. GOLDBERG: NO, YOUR HONOR.

18 HON. T.A. GREEN: CAN I HELP YOU, DEFENSE?

19 MR. KALTGRAD: JUST FOR THE RECORD, YOUR HONOR, I
20 THINK THE VIDEO THAT WE SHOWED I THINK SHOULD BE MARKED
21 AS 645, NEXT IN ORDER.

22 HON. T.A. GREEN: IT WILL BE MARKED AND IT WILL
23 BE IN EVIDENCE.

24

25 (EXHIBIT 645 ADMITTED INTO EVIDENCE)

26

27 HON. T.A. GREEN: OKAY. SO IF I LEAVE AT 3:15,
28 IT'S NOT -- IT STILL MIGHT NOT BE ENOUGH TIME.

1 (OFF-RECORD COMMENTS)

2 HON. T. A. GREEN:: OKAY. WE'LL SEE YOU AT 1:30.

3 {LUNCHEON RECESS}

4 HON. T.A. GREEN: OKAY. ON THE RECORD. THE JURY
5 IS PRESENT. COUNSEL ARE PRESENT.

6 WELCOME BACK.

7 YOU'RE STILL UNDER OATH.

8 PLEASE PROCEED, PLAINTIFF. I GOT YOU RIGHT THAT
9 TIME.

10 MR. GOLDBERG: YOU DID INDEED, YOUR HONOR. THANK
11 YOU.

12 HON. T.A. GREEN: ALL RIGHT.

13 MR. GOLDBERG: YOUR HONOR, MAY I APPROACH THE
14 WITNESS?

15 HON. T.A. GREEN: YES.

16 MR. GOLDBERG:

17 Q I'M GOING TO SHOW YOU A DOCUMENT.

18 A OH, I KNOW, I LOOKED IT UP.

19 Q OH, YOU DID.

20 TELL ME IF YOU'VE EVER SEEN THAT BEFORE.

21 A YES, I HAVE.

22 Q AND DO YOU SEE THE DATE ON THE DOCUMENT?

23 A JULY 1ST, 2015.

24 Q IS THAT WHEN YOU POSTED IT?

25 A I CAN'T HEAR YOU.

26 Q IS THAT WHEN YOU POSTED THIS DOCUMENT?

27 A I WOULD ASSUME SO.

28 Q OKAY.

1 MR. GOLDBERG: I'M GOING TO ASK THAT IT BE
2 ADMITTED, YOUR HONOR.

3 HON. T.A. GREEN: YES, WE DISCUSSED THAT. IT'S
4 GOING TO BE ADMITTED.

5 MR. GOLDBERG: OKAY. NOW, CAN WE SHOW THE FIRST
6 PAGE, PLEASE.

7 Q I BELIEVE THAT'S YOU ON THE LEFT.

8 A CORRECT.

9 Q AND WHO WERE YOU WITH?

10 A JANELLE BOWER.

11 Q BOWER.

12 AND IF WE LOOK AT PAGE 2, IT SAYS -- CAN WE GO TO
13 THE SECOND PAGE OF THAT EXHIBIT, PLEASE. OKAY.

14 IT SAYS, "SOMETIMES WE ARE CLASSY, NOT AT THIS
15 MOMENT. OKAY, FINE. WE ARE CLASSY. ME AND MY PARTNER
16 IN CRIME AND BUSINESS PARTNER AT FILMON TV HR AND
17 HER-ASS WHERE JANELLE AND I GIVE YOU JUST A TIP ON HOW
18 TO HARASS YOUR CO-WORKERS CORRECTLY."
19 AND THEN THERE'S SOMETHING, @TICKLEJIB.

20 IS THAT YOURS?

21 A NO, THAT'S JANELLE'S INSTAGRAM HANDLE.

22 Q OH, OKAY.

23 AND THEN THERE'S SOMETHING CALLED "#CLASSY PEOPLE
24 TAKE PHOTOS OF TOILETS IN THE BACKGROUND."

25 IS THAT YOURS?

26 A YEAH.

27 Q AND THEN YOU'VE GOT HER-ASS NUMBER, HER-ASS
28 NUMBER, MY NAME BITCH NUMBER OPPORTUNISTS; IS THAT YOU?

1 A YEP.

2 Q OKAY. AND THEN YOU'VE GOT "#SIDE, TIP NUMBER,
3 FILMON TV NUMBER; THAT'S YOU?

4 A YES.

5 Q AND THEN YOU'VE GOT, "#MOVIE PREMIER, #BATHROOM,
6 #CLASSY, --

7 HON. T. A. GREEN:: I THINK IT'S CALLED HASH TAG.

8 THE WITNESS: IT IS CALLED HASH TAG. THANK YOU.

9 HON. T.A. GREEN: I KNEW THAT. I KNEW THAT.
10 IT'S THE HOME & GARDEN CHANNEL.

11 MR. GOLDBERG: OKAY. HASH TAG. THANK YOU.

12 Q AND THEN YOU'VE GOT, NUMBER OR "#WEDNESDAY, #HUMP
13 DAY;" IS THAT YOURS AS WELL?

14 A CORRECT.

15 Q NOW, IN LIGHT OF YOUR TESTIMONY THIS MORNING IN
16 WHICH YOU SAID THAT THAT POSTER THAT WE SAW, NUMBER
17 127 --

18 A YEAH.

19 Q -- WAS PUT UP FOR A WEEK IN 2014, WHY ARE YOU
20 TALKING ABOUT IT IN 2015 IN JULY?

21 A 'CAUSE -- WELL, WHY AM I TALKING ABOUT SOMETHING
22 TWO YEARS LATER?

23 Q IT WASN'T TWO YEARS LATER.

24 A OR A YEAR LATER?

25 Q ACCORDING TO YOUR TESTIMONY, YOU SAID IT WAS UP
26 FOR A WEEK IN 2014 AND THEN YOU TOOK IT DOWN.

27 A OKAY.

28 Q AND HERE IT SEEMS THAT YOU'RE REFERRING --

1 A BECAUSE I'M JOKING ABOUT IT.

2 Q SO YOU'RE REFERRING TO THE POSTER THAT YOU HAD
3 TAKEN DOWN A YEAR EARLIER?

4 A YES.

5 Q OKAY. AND DO YOU RECALL WHY YOU WERE JOKING
6 ABOUT IT AT THAT PARTICULAR TIME?

7 A NO.

8 Q WAS IT TIED IN TO ANY PARTICULAR EVENT?

9 A THAT WAS A MOVIE PREMIERE THAT WE WERE DOING FOR
10 ALKI'S MOVIE LORD OF THE FREAKS.

11 Q OKAY. WAS THAT THE DATE OF THE MOVIE PREMIERE?

12 A I DON'T REMEMBER EXACTLY WHAT DAY IT WAS ON.

13 Q ABOUT THE SAME TIME?

14 A SURE.

15 Q OKAY.

16 A I DON'T KNOW WHEN -- OR THIS ONE WAS, YEAH, WHEN
17 HIS MOVIE PREMIERED.

18 Q RIGHT.

19 SO THE DAY OF THE MOVIE PREMIERE, YOU THOUGHT IT
20 WOULD BE FUNNY TO POST SOMETHING ABOUT THAT POSTER
21 HER-ASS; RIGHT?

22 A CORRECT.

23 MS. GAROFALO: OBJECTION. OBJECTION, YOUR HONOR.
24 RELEVANCE.

25 HON. T.A. GREEN: WELL, YEAH -- I DON'T -- THIS
26 WITNESS, THE FACT THAT SHE POSTED IT ON THE DAY OF THE
27 PREMIER --

28 MR. GOLDBERG: WELL, THE ONLY REASON I BRING IT

1 UP, YOUR HONOR, IS BECAUSE SHE TESTIFIED THAT SHE HAD
2 TAKEN IT DOWN A YEAR EARLIER. BUT I'LL MOVE ON.

3 HON. T.A. GREEN: ALL RIGHT.

4 THE WITNESS: I DIVORCED MY HUSBAND A YEAR AGO,
5 BUT I STILL HAVE TO TALK, LIKE, HE'S STILL RELEVANT.

6 MR. GOLDBERG: YEAH. OKAY.

7 Q DO YOU RECALL SOMEONE BY THE NAME OF YELENA
8 CALENDAR?

9 A YELENA CALENDAR?

10 Q YELENA CALENDAR, RATHER, YEAH.

11 A YES, I WORKED WITH HER.

12 Q YOU WORKED WITH HER?

13 A YES.

14 Q DO YOU RECALL WHAT YEAR OR YEARS YOU WORKED WITH
15 MS. CALENDAR?

16 A 2012 TO WHENEVER IT WAS THAT SHE LEFT THE
17 COMPANY.

18 Q DO YOU HAVE ANY RECOLLECTION THAT AT SOME POINT
19 IN TIME MS. CALENDAR TOLD TO YOU TAKE THAT POSTER DOWN?

20 A NO, I DON'T RECALL THAT.

21 Q DO YOU DENY THAT THAT OCCURRED?

22 A NO, I DO NOT RECALL THAT. I'M NOT DENYING IT.

23 Q OKAY. YOU'RE NOT FAMILIAR WITH HER TESTIMONY IN
24 THIS TRIAL, I TAKE IT; RIGHT?

25 A NO.

26 Q YOU DON'T KNOW WHETHER SHE TESTIFIED THAT SHE
27 ASKED YOU TO TAKE IT DOWN?

28 A YES, THAT'S WHAT I JUST SAID.

1 Q OKAY. NOW, DO YOU RECALL EVER POSTING ANYTHING
2 ONLINE ABOUT "HANDS AROUND MY NECK" RELATING TO MR.
3 DAVID?

4 A NOT RELATING TO MR. DAVID.

5 Q OR SOMEBODY ELSE; IS THAT RIGHT?

6 A I DON'T KNOW WHERE YOU'RE GOING WITH THIS.

7 Q OKAY.

8 A IF YOU CAN DISSECT ANY SENTENCE I'VE EVER WRITTEN
9 ONLINE AND THEY ARE NOT GEARED TOWARDS ALKI.

10 Q OKAY. SO -- NOW, YOU'VE TOLD US THIS MORNING
11 THAT ALKI WAS LIKE FAMILY AND TOLD US THAT HE WAS THE
12 GODFATHER OF YOUR CHILD; CORRECT?

13 A CORRECT.

14 Q HOW OFTEN DO YOU SEE THE GODFATHER OF YOUR CHILD?

15 A HOW OFTEN DOES HE SEE HER?

16 Q NO. HOW OFTEN DO YOU SEE MR. DAVID?

17 A WHENEVER -- WHEN I'VE DONE WORK FOR HIM, I'VE
18 SEEN HIM. WHEN AFTER I HAD HER, I DID SOME WORK FOR HIM
19 FOLLOWING UP FOR THE HOLOGRAM COMPANY.

20 Q YEAH.

21 A BUT HE TRAVELS A LOT. I AM A MOTHER -- I'M A
22 SINGLE MOTHER, I CAN'T GO ON -- GO VISITING PEOPLE TWO
23 HOURS AWAY FROM MY HOUSE ALL THE TIME.

24 Q I'M NOT SUGGESTING YOU SHOULD VISIT ANYONE
25 ANYTIME. I'M ASKING YOU WHEN YOU'VE SEEN HIM.

26 A UM-HMM.

27 Q CAN YOU TELL US WHEN'S THE LAST TIME YOU SAW HIM
28 BEFORE TODAY?

1 A I SAW ALKI A MONTH AGO.

2 Q OKAY. AND WAS HE -- WHERE DID YOU SEE HIM A
3 MONTH AGO?

4 A IN MALIBU.

5 Q OKAY. YOU WENT TO HIS HOME?

6 A CORRECT.

7 Q WITH YOUR CHILD?

8 A NO, SHE STAYED AT HOME.

9 Q OKAY.

10 A SHE WAS SICK.

11 Q AND OTHER THAN GOING TO HIS HOUSE IN MALIBU A
12 MONTH AGO, WHEN DID YOU SEE MR. DAVID BEFORE THAT?

13 A BEFORE THAT, I SAW HIM IN THIS COURTHOUSE.

14 Q OKAY. IN CONNECTION WITH SOME OTHER MATTER;
15 RIGHT?

16 A MORE SCAMS, YES.

17 Q OKAY. AND SO ASIDE FROM THE TIME -- THOSE TIMES,
18 HAVE YOU HAD ANY OTHER OCCASION TO SEE MR. DAVID THIS
19 YEAR?

20 A THIS YEAR, NO, I HAVEN'T.

21 Q WHAT ABOUT LAST YEAR?

22 A I THINK I SAW HIM, LIKE, TWICE MAYBE.

23 Q OKAY. DID YOU HAVE ANY -- WHEN'S THE LAST TIME
24 YOU'VE DONE ANY WORK FOR MR. DAVID?

25 A AT -- RIGHT BEFORE I HAD MY DAUGHTER WHEN SHE WAS
26 -- WHEN I WAS NINE MONTHS PREGNANT WITH HER.

27 Q I THINK YOU SAID EIGHT MONTHS PREGNANT; RIGHT?

28 A NO, THAT'S WHEN I LEFT THE COMPANY. WHEN THE

1 COMPANY CLOSED, I WAS EIGHT MONTHS PREGNANT.

2 Q OH, I'M SORRY.

3 SO YOU LEFT THE COMPANY WHEN YOU WERE EIGHT MONTHS
4 PREGNANT BUT YOU CONTINUED DOING WORK?

5 A OR IT WAS -- I DON'T KNOW EXACTLY -- IT WAS -- I
6 COULD TELL YOU EXACTLY WHERE IT WAS AND WHAT WE DID.

7 Q NO, NO. I'M JUST TRYING TO CLARIFY THE TIME
8 FRAME.

9 I THINK YOU SAID THAT YOU WERE EIGHT MONTHS PREGNANT
10 WHEN YOU WERE LET GO, DID I GET THAT RIGHT?

11 A CORRECT. AND HE STILL CONTINUED TO DO SOME STUFF
12 WITH THE HOLOGRAMS.

13 Q YEAH.

14 A AND STILL HAD A COUPLE PEOPLE EMPLOYED.

15 Q WERE YOU ONE OF THEM?

16 A HE NEEDED SOME CONNECTIONS THAT I HAD TO BRING IN
17 SOME PEOPLE TO DO A HOLOGRAM, SO I DID SOME WORK FOR
18 HIM.

19 Q OKAY. THAT'S FINE.

20 AND YOU CONTINUED WORKING FOR HIM UNTIL WHEN?

21 A UNTIL THEN, I GUESS.

22 Q I'M SORRY, UNTIL WHEN?

23 A UNTIL THE END OF THIS ONE SHOOT THAT WE DID.

24 Q OKAY. NOW --

25 A HE'S ASKED ME TO COME DOWN AND HOST EVENTS AT THE
26 HOLOGRAM THEATRE, BUT AGAIN, I CAN'T JUST PICK UP AND
27 LEAVE ALL THE TIME.

28 Q YEAH.

1 YOU'VE SAID THAT, YOU KNOW, THAT PEOPLE WHEN THEY GET
2 FIRED, THEN THEY HAVE ISSUES, RIGHT, THAT'S -- THOSE
3 WERE YOUR WORDS?

4 A CORRECT.

5 Q NOW, WAS IT YOUR UNDERSTANDING THAT MS. REEVES
6 WAS FIRED?

7 A I DON'T KNOW. I -- HONESTLY, LIKE I HAD TOLD
8 YOU --

9 Q SO DO YOU --

10 HON. T.A. GREEN: WAIT, WAIT. ONE AT A TIME.

11 MR. GOLDBERG: MOVE TO STRIKE. MOVE TO STRIKE.

12 THE WITNESS: MY TURN.

13 HON. T.A. GREEN: WAIT, GUYS, SHE WAS ANSWERING
14 AND YOU CUT HER OFF.

15 MR. GOLDBERG: I JUST ASKED HER -- WHAT I ASKED
16 HER WAS WHETHER SHE KNOWS WHETHER MS. REEVES WAS FIRED
17 OR NOT AND SHE SAID SHE DOESN'T KNOW.

18 HON. T.A. GREEN: DO YOU KNOW?

19 THE WITNESS: I DO NOT KNOW.

20 MR. GOLDBERG:

21 Q OKAY.

22 AND THEN MY NEXT QUESTION IS DID MR. DAVID TELL YOU THAT
23 SHE HAD BEEN FIRED?

24 A NO.

25 Q OKAY. DO YOU KNOW ANY OF THE CIRCUMSTANCES
26 SURROUNDING HER --

27 A ALL I KNOW IS --

28 HON. T.A. GREEN: WAIT, WAIT. GUYS. WAIT.

1 QUESTION PAUSE, ANSWER PAUSE.

2 YOUR TURN.

3 MR. GOLDBERG:

4 Q DO YOU KNOW ANY OF THE CIRCUMSTANCES AS TO HOW
5 SHE LEFT THE COMPANY?

6 A NO.

7 Q WHEN -- IN SEPTEMBER OF 2016, I BELIEVE YOU'VE
8 INDICATED THAT YOU WERE A HOST ON THE SHOW BATTLECAM
9 LIVE; RIGHT?

10 A ON BATTLECAM LIVE. YES.

11 Q YEAH.

12 HOW LONG DID THAT CONTINUE FOR?

13 A I THINK WE ONLY KEPT IT UP AND RUNNING FOR A
14 COUPLE OF MONTHS AND THEN WE SHUT IT DOWN AGAIN.

15 Q DO YOU RECALL THERE WAS A POINT IN TIME WHEN MS.
16 REEVES WAS NO LONGER COMING TO WORK AT BATTLECAM LIVE?

17 A I ACTUALLY COULD CARE LESS. I COULD CARE LESS
18 FOR YOU AS A PERSON, SO I DIDN'T REALLY ASSOCIATE WITH
19 HER, SO I WASN'T WORRIED ABOUT IF SHE WAS COMING TO
20 WORK, IF SHE WAS IN TIMBUKTU, I DON'T -- DID NOT CARE
21 WHERE SHE WAS.

22 Q RIGHT.

23 I UNDERSTAND THAT YOU DIDN'T CARE WHERE SHE WAS.
24 MY QUESTION WAS, DID YOU HAPPEN TO NOTICE --

25 A NO.

26 Q -- AFTER SEPTEMBER 19TH, 2016, THAT SHE WAS NO
27 LONGER --

28 A WELL, EVENTUALLY, ONE DAY, YES, I DID.

1 HON. T.A. GREEN: OKAY, GUYS, YOU'VE GOT TO PAUSE
2 -- QUESTION PAUSE, ANSWER PAUSE, QUESTION PAUSE, YOU'RE
3 OVERLAPPING.

4 MR. GOLDBERG:

5 Q OKAY. WHEN DID YOU FIRST REALIZE THAT MS. REEVES
6 WAS NOT COMING TO WORK?

7 A A COUPLE WEEKS AFTER SHE WASN'T WORKING THERE
8 ANYMORE.

9 Q RIGHT. AND DID YOU SPEAK TO MR. DAVID AS TO WHY
10 SHE WASN'T COMING TO WORK?

11 A NO, BECAUSE I COULD CARE LESS.

12 Q OKAY. WELL, I THINK YOU'VE SAID THAT SEVERAL
13 TIMES NOW.

14 A YOU'VE ASKED ME THE SAME QUESTION SEVERAL TIMES.

15 Q ALL RIGHT. WELL -- SO AT THE POINT IN TIME THAT
16 SHE WAS NOT COMING TO WORK, WHO TOOK OVER HER DUTIES AND
17 RESPONSIBILITIES?

18 A I DON'T EVEN KNOW WHAT HER ROLE WAS BESIDES A
19 WRITER FOR A SHOW THAT DID NOT NEED WRITING, SO NOBODY
20 NEEDED TO TAKE OVER HER POSITION.

21 Q SO WASN'T SHE ALSO A HOST ON THAT SAME SHOW THAT
22 YOU WERE A HOST ON?

23 A WE STOPPED ALL THE SHOWS.

24 Q RIGHT. WELL, WHEN DID THAT HAPPEN?

25 A I DON'T KNOW EXACTLY WHAT DATE IT HAPPENED --
26 WHAT -- IN RELATION TO WHEN SHE WORKED THERE OR DIDN'T
27 WORK THERE.

28 Q OKAY. NOW, EXCUSE ME. I THINK YOU TOLD US THAT

1 YOU ALSO WORKED AT THE HOLOGRAM PART OF THE BUSINESS;
2 CORRECT?

3 A CORRECT.

4 Q NOW, DO YOU -- WERE YOU EVER PRESENT WHEN MS.
5 REEVES WAS -- WAS THERE WITH A COMIC SHOWING HIM HOW THE
6 HOLOGRAMS WORK?

7 A NO.

8 Q DID YOU DO ANY OF THOSE DEMONSTRATIONS?

9 A CORRECT. YEAH, I DID.

10 Q DID YOU EVER DO THEM WHEN MS. REEVES WAS THERE?

11 A I DON'T BELIEVE SO.

12 Q OKAY. YOU ALSO SAID THAT YOU BUILT THE HOLOGRAMS
13 AT VARIOUS -- WAS THAT FOR VARIOUS CUSTOMERS?

14 A UM-HMM.

15 HON. T.A. GREEN: YES?

16 THE WITNESS: YES.

17 MR. GOLDBERG:

18 Q DOES THAT MEAN THAT YOU WERE OFF-SITE PART OF THE
19 TIME OF YOUR WORK?

20 A YES.

21 Q AND HOW MUCH -- LET'S SAY, DURING YEAR 2016, HOW
22 MUCH OF YOUR TIME WERE YOU NOT AT THE CORPORATE OFFICES?

23 A WELL, I WOULD ALSO WORK ABOUT 12-HOUR DAYS, SO
24 SOMETIMES HALF OF THAT WOULD BE ON-SITE AT SOMETHING
25 THAT WAS IN L.A., SOMETIMES IT WOULD BE IN A DIFFERENT
26 STATE, SOMETIMES I WOULD BE FULLY IN THE OFFICE.

27 Q OKAY. CAN YOU GIVE US ANY APPROXIMATION IN THE
28 YEAR 2016, HOW MUCH OF THAT YEAR YOU WERE OUT OF THE

1 OFFICE? WERE YOU BASICALLY IN ANOTHER STATE OR ON-SITE
2 AT SOME CUSTOMER?

3 A I WOULD SAY ON AVERAGE A WEEK OUT OF THE MONTH.

4 Q ONE WEEK YOU WOULD BE GONE?

5 A OUT OF EVERY MONTH, YEAH.

6 Q OKAY. AND WHEN YOU WERE GONE, WHO TOOK OVER YOUR
7 RESPONSIBILITIES?

8 A MY RESPONSIBILITY WAS WITH ME, SO IT -- I WAS
9 TAKING CARE OF IT WHEN I WAS ON THE ROAD.

10 Q SO HOW MUCH TIME -- WELL, DURING THAT PERIOD OF
11 TIME, WERE YOU WORKING SOLELY ON HOLOGRAMS?

12 A YEAH.

13 Q HOW LONG DID YOU WORK SOLELY ON THE HOLOGRAM PART
14 OF THE BUSINESS?

15 A LIKE, THE LAST TWO YEARS WORKING THERE.

16 Q SO I DIDN'T QUITE UNDERSTAND WHEN YOU LEFT.

17 CAN YOU GIVE US THAT AGAIN, WHAT YEAR?

18 A 2017, AUGUST 12TH.

19 Q SO YOU'RE SAYING THE LAST TWO YEARS OF YOUR
20 EMPLOYMENT. WOULD THAT MEAN FROM AUGUST OF '15 TO
21 AUGUST '17 YOU WERE EXCLUSIVELY ON HOLOGRAMS?

22 A YES.

23 Q AND DID YOU DO ANY WORK ON SHOWS DURING THAT
24 TIME --

25 A YES.

26 Q -- WHEN YOU WERE AT HOLOGRAM?

27 A SO I GUESS TECHNICALLY, YES, IT WAS SOME STUFF
28 FOR FILMON.

1 Q OKAY. THIS --

2 A AND ALL OF HIS --

3 HON. T.A. GREEN: WAIT, WAIT, WAIT. YOU'RE
4 MAKING IT REALLY HARD OF MADAM REPORTER TO TAKE ALL THIS
5 DOWN.

6 SO DID YOU FINISH YOUR QUESTION?

7 MR. GOLDBERG: NO.

8 HON. T.A. GREEN: OKAY. FINISH YOUR QUESTION.

9 MR. GOLDBERG:

10 Q YOU DID STILL DO SOME WORK ON FILMON; CORRECT?

11 A CORRECT.

12 Q AND THAT WAS IN CONNECTION WITH THAT BEVERLY --
13 WITH THE BATTLECAM LIVE SHOW THAT YOU TOLD US ABOUT --

14 A CORRECT.

15 Q -- IS THAT CORRECT?

16 A CORRECT.

17 Q OKAY. NOW, I THINK YOU ALSO SAID ALL THESE WOMEN
18 FILING LAWSUITS, WERE THOSE YOUR WORDS?

19 A YEAH. AND MEN, I GUESS, NOW TOO, SO...

20 Q NOW, THE -- WAS -- DID THAT INCLUDE MARY RIZZO?

21 A I KNEW HIS GIRLFRIEND, YES. I DO KNOW THAT SHE
22 DID FILE A CASE.

23 MS. GAROFALO: YOUR HONOR, OBJECTION. THIS IS
24 VIOLATING --

25 HON. T.A. GREEN: SUSTAINED.

26 MR. GOLDBERG: WELL, I JUST WANT TO KNOW WHAT SHE
27 WAS REFERRING TO, YOUR HONOR.

28 HON. T.A. GREEN: OKAY. BUT WE'VE HAD

1 DISCUSSIONS ABOUT THIS. LET'S MOVE ON.

2 MR. GOLDBERG: NOW -- I HAVE NOTHING FURTHER.

3 HON. T.A. GREEN: THANK YOU.

4 DEFENSE. GOT IT RIGHT THAT TIME, TWICE IN A ROW.

5

6

REDIRECT EXAMINATION

7

MS. GAROFALO:

8

Q OKAY. VERY BRIEFLY, MS. JOHNSON.

9

BEHIND YOU THERE ARE NOTEBOOKS AND MAYBE MR.

10

KALTGRAD CAN HELP YOU FIND EXHIBIT 198.

11

MR. KALTGRAD: WE ACTUALLY HAVE IT.

12

MS. GAROFALO: OH, IT'S ACTUALLY IN. OKAY. SO

13

LET'S PUT UP EXHIBIT 198. AND THIS WAS SHOWN TO YOU BY

14

MR. GOLDBERG.

15

OKAY. CAN YOU GO DOWN TO THE CHART.

16

MR. GOLDBERG: DO YOU WANT TO SEE A HARD COPY?

17

MS. GAROFALO: THAT'S FINE.

18

Q OKAY. SO IS THERE A HARD COPY IN THERE? CAN I

19

HAVE THE IPAD. OKAY.

20

SO TELL US AGAIN WHAT EXHIBIT 198 IS, IF YOU

21

RECALL?

22

A BATTLECAM SCHEDULE, THE CALL SHEET.

23

Q OKAY. AND DO YOU REMEMBER MR. GOLDBERG ASKING

24

YOU ABOUT TOPICS AND POLITICS AND NEWS AND SOCIAL

25

EVENTS?

26

A YEAH.

27

Q DO YOU RECALL THAT?

28

CAN WE GO TO PAGE -- ACTUALLY, GO TO PAGE 3 OF

1 THIS, MR. KALTGRAD.

2 THIS IS THE PAGE THAT MR. GOLDBERG DID NOT SHOW
3 YOU.

4 ARE WE THERE?

5 MR. KALTGRAD: THAT'S THE PAGE THERE.

6 MS. GAROFALO: OKAY. CAN YOU MAKE IT A LITTLE
7 BIT BIGGER.

8 Q WHAT IS PAGE 3? WHAT IS THIS THAT WE'RE LOOKING
9 AT, IF YOU KNOW?

10 A SAYING WHO'S TALENT AND IN THE BACK AND THE
11 COMPANIES.

12 Q OKAY. IS IT THE ACTUAL RUNDOWN FOR THE SHOW?

13 A IT'S A VERY ROUGH ONE, I GUESS. I'M SURE THEY
14 HAD MORE STUFF THAT THEY WERE LOOKING AT WHEN THEY
15 WERE...

16 Q AND I -- CAN YOU GET THE WHOLE THING ON THE
17 SCREEN?

18 PERHAPS -- CAN YOU SEE THAT, MS. JOHNSON, I DON'T HAVE A
19 PRAYER, BUT...

20 A YES.

21 Q OKAY. AND CAN YOU TELL BY LOOKING AT THIS HOW
22 MUCH OF THE -- LET ME ASK YOU THIS FOUNDATIONAL QUESTION
23 BEFORE WE GO THERE.

24 WHAT IS A RUNDOWN OF THE SHOW? WHAT IS THAT
25 SHOWING?

26 A THE WHICH -- WAIT, WHAT?

27 Q WHAT DOES THIS SHOW, WHAT'S ON THE SCREEN NOW?

28 A IT'S SHOWING WHO THE HOSTS ARE, WHAT TIME WE'LL

1 HAVE AN INTERCHANGE BEFORE COMMERCIALS.

2 Q AND DOES THIS SHOW THE ACTUAL SEGMENTS THAT WERE
3 ON THE SHOW THAT DAY?

4 A I WOULD GUESS SO, YES.

5 Q OKAY. ARE YOU FAMILIAR WITH THIS DOCUMENT? DID
6 YOU USED TO SEE THESE BEFORE THE SHOWS?

7 A I WOULD SEE A LOT OF THEM, BUT MOST OF THE TIME I
8 WOULD DISREGARD THEM BECAUSE THEY HAD NOTHING TO DO WITH
9 ME.

10 Q OKAY. AND CAN YOU TELL FROM LOOKING AT THIS
11 DOCUMENT WHAT PERCENT OR HOW MUCH OF THE SEVERAL HOUR
12 LONG SHOW WAS DEVOTED TO THE TOPICS MR. GOLDBERG ASKED
13 YOU ABOUT, POLITICS AND NEWS, AND SO FORTH?

14 A YEAH, LIKE NONE OF IT REALLY.

15 Q YEAH.
16 AND HOW MUCH OF IT WAS DEVOTED TO THE BATTLECAMER AND
17 THE MORE EXTREME MATERIAL THAT WE'VE TALKED ABOUT?

18 A WELL, THE BATTLECAMERS ARE PRETTY MUCH ON IT THE
19 ENTIRE TIME.

20 Q OKAY.

21 A SO AT LEAST 50 PERCENT OF THE SHOW THERE WAS
22 BATTLECAMERS INVOLVED.

23 Q OKAY. SO IF WE GO DOWN -- CAN YOU GO DOWN TO IT
24 AND BLOW THAT UP, PLEASE.

25 OKAY. AND I'M SORRY, BEAR WITH ME ONE MINUTE.

26 OKAY. AND DO YOU SEE WHERE IT SAYS "THE SCOOP"?

27 A UM-HMM.

28 Q WHAT DOES THAT MEAN, IF YOU KNOW?

1 A I HAVE NO IDEA.

2 Q OKAY. WAS THAT THE KIND OF MATERIAL WE SAW ON
3 THAT LIST THAT YOU COULD CHOOSE AS A HOST THE TOPICS
4 FROM, POLITICS AND SO FORTH?

5 A YEAH, IT'S PROBABLY, LIKE, PICK UP SOMETHING AND
6 TALK ABOUT IT FOR --

7 Q OH, OKAY.

8 A -- FOR THOSE TEN MINUTES, THEY'RE GOING TO SIT
9 THERE AND INTERACT WITH BATTLECAMERS.

10 Q OH, OKAY.

11 A THE NEXT ONE IS GOING TO TALK ABOUT --

12 HON. T.A. GREEN: GUYS, YOU'RE TALKING OVER EACH
13 OTHER.

14 MS. GAROFALO: I'M SORRY, YOUR HONOR.

15 HON. T.A. GREEN: NO. DO YOU WANT TO FINISH YOUR
16 ANSWER?

17 THE WITNESS: THEN LIKE THE SCOOP, I'M GUESSING
18 IS WHEN THEY WOULD TALK ABOUT THE DIFFERENT TOPICS THAT
19 THEY COULD CHOOSE FROM -- FROM THAT LIST.

20 HON. T.A. GREEN: OKAY. YOUR TURN.

21 MS. GAROFALO:

22 Q AND CAN YOU TELL FROM LOOKING AT THIS HOW MUCH
23 TIME IN THE OVERALL SHOW WAS DEVOTED TO THE TOPICS OTHER
24 THAN THE EXTREME MATERIAL THAT'S BEEN DESCRIBED?

25 A I GUESS, NO, NONE.

26 Q ABOUT TEN MINUTES?

27 MR. GOLDBERG: OBJECTION, YOUR HONOR, SHE'S
28 PUTTING WORDS IN HER MOUTH.

1 HON. T.A. GREEN: OVERRULED. OVERRULED.

2 MS. GAROFALO: CAN YOU GET THE TIME ON THE SIDE,
3 MR. KALTGRAD.

4 MR. KALTGRAD: I'VE LOST THE CONNECTION.

5 MS. GAROFALO: YEAH, WE'VE LOST THE CONNECTION, I
6 APOLOGIZE.

7 THE WITNESS: WELL, ABOUT -- THE FIRST ONE I'M
8 TALKING WITH BATTLECAMERS, YOU KNOW, THAT ONE WAS TAKING
9 PHONE CALLS FROM BATTLECAMERS, BATTLECAMERS,
10 BATTLECAMERS. SO EVERYTHING BESIDE THE ONE THING THAT
11 SAYS THAT IS NEXT TO THE SCOOP INVOLVES THE
12 BATTLECAMERS.

13 MS. GAROFALO:

14 Q OKAY. JUST BEAR WITH US FOR ONE SECOND. WHILE
15 MR. KALTGRAD IS DOING THAT, LET ME JUST ASK YOU MY NEXT
16 QUESTION. YOU -- THERE YOU GO. AND YOU MAY BE ABLE TO
17 SEE THAT.

18 DO YOU SEE OVER TO THE LEFT, THERE'S A COLUMN
19 WITH WHAT LOOKS LIKE NUMBERS?

20 A UM-HMM.

21 Q AND WHAT DO THOSE NUMBERS TELL US, IF YOU KNOW?

22 A YOU MEAN THE FIRST COLUMN?

23 Q WELL, FIRST THE COLUMN --

24 A IT'S LIKE --

25 Q COMMERCIAL, COMMERCIAL, COMMERCIAL; RIGHT?

26 A YEAH.

27 Q AND WHAT DOES THAT COLUMN MEAN?

28 A THE DIFFERENT SEGMENTS THAT ARE GOING TO BE IN

1 THE SHOW.

2 Q OKAY. AND NEXT TO THAT COLUMN UP ABOVE THE
3 COLUMN UNDER TIME, WHAT IS THAT?

4 A THE TIME THAT THEY ARE GOING TO BE SHOOTING THAT
5 SEGMENT IN.

6 Q OKAY. SO FOR ANY PARTICULAR SEGMENT, WE COULD
7 JUST LOOK AT THE TIME ON THE LEFT; CORRECT?

8 A UM-HMM.

9 MS. GAROFALO: CAN YOU GO BACK TO THE SCOOP, MR.
10 KALTGRAD.

11 AHH. THERE WE GO. THERE'S ONE, "POP TALK."

12 Q AND WHAT WAS POP TALK, IF YOU KNOW?

13 A I HAVE NO IDEA BECAUSE I --

14 MR. GOLDBERG: OBJECTION. ANYTHING AFTER "I
15 DON'T KNOW."

16 HON. T.A. GREEN: NO, YOU CAN SAY WHY YOU DON'T
17 HAVE ANY IDEA.

18 THE WITNESS: BECAUSE I ALREADY -- WE CAME UP
19 WITH OUR TOPICS BEFORE, SO I NEVER LOOKED AT THE LIST OF
20 THINGS THAT WERE OFFERED FOR THEM.

21 MS. GAROFALO:

22 Q OKAY. BUT IS IT CORRECT THAT IF WE LOOK TO THE
23 SIDE AND I THINK IT SAYS THREE, WHATEVER IT DOES SAY,
24 THAT THAT'S THE TIME THAT THIS PARTICULAR SEGMENT WAS
25 ON?

26 A UM-HMM.

27 Q OKAY. NOW, YOU REPEATED SEVERAL TIMES AND YOU
28 WERE NOT ALLOWED TO RESPOND, YOU SAID YOU DIDN'T

1 ASSOCIATE WITH MS. REEVES.

2 DO YOU RECALL THAT?

3 A YEAH, LIKE, I WOULDN'T LIKE GO TO LUNCH WITH HER
4 OR ASK HER HOW HER MORNING WAS.

5 Q LET ME JUST ASK MY QUESTION. I JUST WANT YOU TO
6 TELL US WHAT YOU MEANT BY --

7 A WHY I DON'T ASSOCIATE WITH?

8 Q YES.

9 A LIKE, I DON'T WANT TO GO HANG OUT WITH HER
10 OUTSIDE OF WORK. I DON'T WANT TO -- I'M NOT GOING TO
11 MAKE SMALL TALK.

12 Q OKAY. WAS THERE A REASON THAT YOU CHOSE NOT TO
13 ASSOCIATE WITH MS. REEVES?

14 A THERE'S JUST SOME PEOPLE YOU GET A FEELING ABOUT
15 AND YOU JUST DON'T NEED THEM IN YOUR LIFE OR WANT TO BE
16 AROUND THAT TYPE OF PERSON.

17 Q AND WAS MS. REEVES ONE OF THOSE PEOPLE?

18 A I JUST DON'T THINK SHE'S THE MOST EMOTIONALLY
19 STABLE PERSON AND I THINK A LOT OF THE PEOPLE THAT ARE
20 SUING HIM RIGHT NOW ARE SCAM ARTISTS.

21 MR. GOLDBERG: OBJECTION, YOUR HONOR. NOW SHE'S
22 MAKING A MEDICAL DIAGNOSIS.

23 HON. T.A. GREEN: OKAY. EXCUSE ME. I'M SORRY,
24 WHAT'S THE OBJECTION?

25 MR. GOLDBERG: THE OBJECTION IS THAT SHE HAS NO
26 BASIS FOR THAT, CALLING MY CLIENT NAMES.

27 HON. T.A. GREEN: NO, NO, NO. OKAY. THE SCAM
28 ARTIST PART IS OFF THE TABLE, IS OFF YOUR PLATE, BUT

1 SEVERAL TIMES DURING CROSS YOU ELICITED FROM THE WITNESS
2 THAT SHE DIDN'T ASSOCIATE WITH YOUR CLIENT AND IT'S FAIR
3 TO ASK WHY, I MEAN...

4 MR. GOLDBERG: THAT'S FINE. AND I THINK SHE'S --
5 THAT'S FINE, SHE COULD SAY THAT. OKAY. SHE COULD TELL
6 US WHY.

7 HON. T.A. GREEN: OKAY.

8 MS. GAROFALO:

9 Q AT THE TIME, NOT ANYTHING YOU LEARNED LATER, BUT
10 AT THE TIME THAT MS. REEVES AND YOU WERE BOTH WORKING AT
11 EITHER FILMON OR HOLOGRAM --

12 A UM-HMM.

13 Q -- IS THERE A REASON THAT YOU CHOSE NOT TO
14 ASSOCIATE WITH MS. REEVES?

15 A I WAS JUST BUSY. I HAD A LOT TO DO, SO I JUST --
16 I DIDN'T CARE FOR ALL THE DRAMA IN THE OFFICE, SO I JUST
17 DID MY THING.

18 Q OKAY. WAS THERE DRAMA INVOLVING MS. REEVES?

19 A WELL, I JUST DIDN'T WANT TO, LIKE, SIT AROUND AND
20 TALK ABOUT WHY HER APARTMENT BURNT DOWN, LIKE, I DON'T
21 CARE. OR ABOUT HER BOYFRIEND WHO, LIKE, I DON'T CARE.

22 Q MS. REEVES TALK ABOUT HER BOYFRIEND IN THE
23 OFFICE?

24 A YEAH, ABOUT A COMEDIAN BOYFRIEND.

25 MR. GOLDBERG: OBJECTION.

26 HON. T.A. GREEN: WHAT'S THE OBJECTION?

27 MR. GOLDBERG: RELEVANCE.

28 HON. T.A. GREEN: OKAY. YEAH, I THINK WE'RE

1 EXPLORING THE OUTER LIMITS HERE.

2 MS. GAROFALO: OKAY. I HAVE NO FURTHER
3 QUESTIONS.

4 THANK YOU, MS. JOHNSON.

5

6 RECROSS EXAMINATION

7 MR. GOLDBERG:

8 Q DID MS. REEVES WANT TO HANG AROUND WITH YOU?

9 MS. GAROFALO: OBJECTION, YOUR HONOR.

10 HON. T.A. GREEN: ACTUALLY, THAT CALLS FOR
11 SPECULATION.

12 MR. GOLDBERG:

13 Q LET'S GO TO PAGE 3 OF EXHIBIT 198.

14 NOW, FIRST OF ALL, THIS HAS A LIST OF TIME THAT
15 THIS SHOW IS GOING TO BE RUNNING.

16 DO YOU SEE THAT?

17 A YES, I DO.

18 Q AND DOES THIS REFRESH YOUR RECOLLECTION THAT THIS
19 SHOW RAN FROM 2:00 P.M. TO 7:00 P.M.?

20 A CORRECT.

21 Q YEAH. AND I DON'T SEE YOUR NAME ON HERE.
22 SO HOW IS THAT YOUR NAME IS NOT ON HERE IF YOU'RE ONE OF
23 THE HOSTS?

24 A BECAUSE I DIDN'T SHOW THE HOST EVERY DAY.

25 Q SO HOW OFTEN DID YOU HOST A SHOW?

26 A IT WAS, LIKE, ONCE A WEEK.

27 Q OH, OKAY.

28 A BECAUSE I HAD A JOB DOING OTHER THINGS IN THE

1 COMPANY.

2 Q OKAY. THAT'S FINE.

3 SO YOU HOSTED THE SHOW ABOUT ONCE A WEEK; CORRECT?

4 A CORRECT.

5 Q NOW, THE --

6 A HOW COME THE WRITER'S NAME IS IN THE TALENT?

7 HON. T.A. GREEN: OKAY. NO QUESTION. NO
8 QUESTION.

9 MR. GOLDBERG:

10 Q DID YOU KNOW THE NAMES ON HERE: ELIJAH,
11 CHRISTINE? DO YOU KNOW WHO THEY WERE?

12 A NO.

13 Q YOU DIDN'T KNOW -- DO YOU KNOW WHO JEN WAS?

14 A NO.

15 Q SO YOU DIDN'T KNOW ANY OF THE OTHER HOSTS; IS
16 THAT CORRECT?

17 A I KNEW SOME OF THE PEOPLE, YEAH, BUT I WORKED FOR
18 THE COMPANY, SO I KNEW EVERYBODY RUNNING THE SHOWS.

19 Q RIGHT. BUT DID YOU KNOW ANY OF THE PEOPLE THAT
20 ARE ON THIS LIST?

21 A NO.

22 MR. GOLDBERG: I HAVE NOTHING FURTHER.

23 HON. T.A. GREEN: ANYTHING ELSE?

24 MS. GAROFALO: JUST VERY BRIEFLY, YOUR HONOR.

25 OKAY. I JUST WANT TO BRING UP EXHIBIT 198 AGAIN.

26 OKAY. JUST MAKE IT SLIGHTLY BIGGER.

27 ///

28 ///

1 FURTHER REDIRECT EXAMINATION

2 MS. GAROFALO:

3 Q OKAY. SO YOU SEE -- AND IF I MAY APPROACH, YOUR
4 HONOR, SO I CAN --

5 MR. GOLDBERG: I HAVE A HARD COPY IF YOU WANT IT.

6 MS. GAROFALO:

7 Q OKAY. SO IF WE GO DOWN TO THE YELLOW VERSION, DO
8 YOU SEE WHERE IT SAYS "LAUREN AND JEN"?

9 A UM-HMM.

10 Q "POP TALK, CHAT OVERLAY" AND THEN IT SAYS, "THE
11 SCOOP, TALK ABOUT ARI'S TOPICS, TAKE PHONE CALLS, CHAT."

12 IF YOU KNOW, IS THAT THE ARI WHO PREPARED THE
13 LIST OF POTENTIAL TOPICS?

14 A I WOULD THINK SO.

15 Q ALL RIGHT. AND HERE IT APPEARS THAT IT WAS 5
16 MAYBE 30, 35 MINUTES OF THE SHOW THAT ARI'S TOPICS WERE
17 SLOTTED IN FOR; IS THAT RIGHT?

18 A YES. YEP.

19 Q OKAY. AND IF YOU GO DOWN JUST UNDER THE LINE, DO
20 YOU SEE THE DARKENED LINE?

21 A UM-HMM.

22 Q AND THE FIRST ONE SAYS, "ELIJAH AND CHRISTINE,
23 CHAT OVERLAY, TRASH TALKING AND CHAT WITH PHONE CALLS."

24 DO YOU KNOW WHEN THE COMPANY USED THE WORD "TRASH
25 TALKING" ON ITS SCHEDULES, WHAT IT WAS REFERRING TO?

26 A PROBABLY WAS BATTLECAMERS. THEY ARE, LIKE, A
27 BUNCH OF PEOPLE THAT LIKE TO GET ONLINE AND TALK CRAP
28 ABOUT EACH OTHER. AND SO THEY, LIKE, GET ON THERE AND,

1 LIKE, KIND OF -- IT'S, LIKE, IF YOU JUST PUT A BUNCH OF
2 PEOPLE IN A ROOM AND THEY COULD ALL SAY WHATEVER THEY
3 WANTED TO SAY, IT'S KIND OF WEIRD, YEAH.

4 Q OKAY. FROM YOUR EXPERIENCE HOSTING, WOULD THE
5 TRASH TALKING WITH THE BATTLECAMERS TYPICALLY BE A
6 DISCUSSION ABOUT INTERNATIONAL NEWS?

7 A SOMETIMES.

8 Q AND WAS IT TYPICALLY A DISCUSSION MORE ABOUT THE
9 KINDS OF THINGS YOU TOLD US WERE COVERED ON BATTLECAM?

10 A UM-HMM.

11 HON. T.A. GREEN: YES?

12 THE WITNESS: YEAH.

13 MS. GAROFALO:

14 Q SORT OF A PERSONAL COMPETITION AS TO WHO COULD BE
15 MORE GROSS; WOULD THAT BE CORRECT?

16 A YES.

17 Q AND LET'S STICK WITH WHEN YOU HOSTED BATTLECAM
18 LIVE.

19 HOW MUCH OF THE SHOW WOULD YOU ESTIMATE WAS
20 DEVOTED TO TRASH TALKING?

21 A IT WASN'T MUCH TRASH TALKING. IT WAS -- I LIKED
22 IT WHEN THEY INTERACTED BECAUSE IT GAVE SOMETHING --
23 THEY GAVE SOMETHING INTERESTING TO THE SHOWS. AND THEY
24 KIND OF LIKED IT WHEN YOU WOULD JUST KIND OF TALK BATTLE
25 WITH THEM AND LIKE STAND UP -- LIKE WHAT LAWYERS DO.
26 LIKE, THEY LIKE TO BATTLE BACK AND FORTH WITH YOU.
27 THAT'S PRETTY MUCH WHAT THEY MEANT BY TRASH TALKING.

28 MS. GAROFALO: OKAY. I HAVE NO FURTHER

1 QUESTIONS.

2

3

FURTHER CROSS EXAMINATION

4

MR. GOLDBERG:

5

Q JUST TO CLARIFY. YOU KNOW, IF YOU LOOK AT THAT
6 LIST, JUST THE ONE THAT'S RIGHT UP THERE.

6

7

COULD WE PUT IT BACK UP, 198.3.

8

9

10

11

12

13

14

15

YOU KNOW, IT LOOKS LIKE THAT DAY WHEN LAUREN AND
JEN ARE ON, THEY ARE TALKING TO THE BATTLECAMERS FROM
2:10 TO 2:35. AND THEN FROM 2:35 TO 3:05, EACH HOST
PICKS THREE ITEMS TO TALK ABOUT WITH THE CHATTER. THEN
FROM 3:05 TO 3:35, THEY TALK ABOUT THE SCOOP. THEN FROM
3:35 TO 4:05, THEY TALK ABOUT ARI'S TOPICS AND SCOOP,
THEN THEY TALK ABOUT -- TO THE BATTLECAMERS TOWARD THE
END.

16

17

DOES THAT SEEM TO BE ABOUT THE WAY YOUR SHOW WAS
STRUCTURED AS WELL?

18

A NO.

19

Q OKAY.

20

MR. GOLDBERG: NOTHING FURTHER.

21

THE WITNESS: WE WANTED -- OKAY.

22

MS. GAROFALO: NOTHING FURTHER, YOUR HONOR.

23

HON. T.A. GREEN: OKAY. YOU'RE EXCUSED. THANK
24 YOU FOR BEING HERE.

25

THE WITNESS: YEAH, THANK YOU.

26

HON. T.A. GREEN: OKAY. DEFENSE.

27

MR. GOLDBERG: WELL, WE ARE RESUMING THE CROSS OF
28 DR. MEYER.

1 HON. T.A. GREEN: OKAY. WE'RE -- TECHNICALLY
2 WE'RE BACK ON THE PLAINTIFF'S CASE, BUT IT'S THE DEFENSE
3 CROSS OF THE DOCTOR.

4 MR. GOLDBERG: YEAH.

5 HON. T.A. GREEN: JUST TO REORIENT OURSELVES.

6 MR. DAVID: DO YOU WANT ME BACK?

7 HON. T.A. GREEN: NO. I'M SORRY. NO, THE DOCTOR
8 IS ON NOW.

9 MR. DAVID: OH, OKAY. WHEN DO YOU NEED ME?

10 HON. T.A. GREEN: WELL, WE COULD BE REALLY
11 PRESSED, WE NEED TO GET DONE WITH THE DOCTOR TODAY. HOW
12 DO YOU WANT TO ADVISE YOUR CLIENT?

13 MS. GAROFALO: DON'T THINK SO. I MEAN, IF WE RUN
14 FIVE OR TEN MINUTES SHORT, I'M GOING TO TRY TO GET
15 THROUGH THIS, I JUST DON'T KNOW.

16 HON. T.A. GREEN: THEN I GET TO BE FIVE OR TEN
17 MINUTES EARLIER.

18 MS. GAROFALO: EARLIER. SPEND MORE TIME --

19 HON. T.A. GREEN: OKAY. DOCTOR, YOU'RE WELCOME
20 BACK, HAVE A SEAT, YOU'RE STILL UNDER OATH.

21 MR. GOLDBERG: DID WE ADMIT THAT LAST EXHIBIT?

22 MS. LEAL: I BELIEVE WE DID. DID WE ADMIT THE
23 LAST EXHIBIT?

24 MR. GOLDBERG: YOUR HONOR, THE EXHIBIT THAT WE
25 SHOWED THE WITNESS AND THAT WE SHOWED THE JURY, I WOULD
26 ASK THAT IT BE ADMITTED. WHAT NUMBER IS IT?

27 THE CLERK: I DON'T HAVE A NUMBER.

28 MR. GOLDBERG: I BELIEVE IT WAS 230; RIGHT?

1 HON. T.A. GREEN: OKAY. WE ALREADY SHOWED THE
2 JURY, SO IT WILL BE...

3 MR. GOLDBERG: IT WILL BE EXHIBIT 230, YOUR
4 HONOR.

5 HON. T.A. GREEN: ALL RIGHT. 230.

6
7 (EXHIBIT 230 ADMITTED INTO EVIDENCE)

8
9 MR. GOLDBERG: OKAY. DR. MEYER, PLEASE DON'T
10 COMMUNICATE WITH THE JURY.

11 THE WITNESS: I JUST FOUND A HAT. I JUST DIDN'T
12 KNOW WHOSE IT WAS.

13 MS. GAROFALO: OH. FINDERS KEEPERS.

14 THE WITNESS: NO, IT SAYS KEEPERS, THAT'S NOT FOR
15 ME.

16 HON. T.A. GREEN: OH, THANK YOU. A PERK OF THE
17 JOB.

18
19 CROSS EXAMINATION (RESUMED)

20 MS. GAROFALO:

21 Q OKAY. SO I BELIEVE THAT WHERE WE LEFT OFF, SEEMS
22 LIKE A LIFETIME AGO, WE WERE DISCUSSING HOW YOUR VIEW OF
23 MS. REEVES' TESTIMONY AND OTHER TESTIMONY HAD ALTERED
24 THE OPINIONS YOU WERE PROVIDING HERE.

25 DO YOU RECALL THAT?

26 A I DON'T RECALL THAT. I REMEMBER HAVING THE
27 DISCUSSION ABOUT THAT, BUT THAT'S NOT HOW I RECALL IT.

28 Q OKAY. AND YOU TOLD US THAT YOU READ MR.

1 WEISMAN'S TESTIMONY AND IT MADE YOU REALIZE HOW -- HOW
2 -- I FORGET THE EXACT WORD YOU USED, I APOLOGIZE, BUT
3 HOW EXTREME THE ASSAULTS WERE ON MS. REEVES.

4 DO YOU RECALL THAT?

5 A YES, I DO RECALL THAT.

6 Q OKAY.

7 AND YOU DID TELL US THAT MR. WEISMAN -- READING MR.
8 WEISMAN AND MS. REEVES' TESTIMONY PROVIDED YOU
9 INFORMATION THAT YOU HAD NOT PREVIOUSLY HAD; CORRECT?

10 A CORRECT.

11 Q AND THAT INFORMATION INCLUDED CERTAIN SPECIFIC --
12 STRIKE THAT.

13 THAT INFORMATION INCLUDED CERTAIN FACTS RELATING
14 TO MS. REEVES' ALLEGATIONS IN THIS CASE; CORRECT?

15 A CORRECT. ASSUMING THEY WERE FACTS. YOU
16 QUESTIONED THAT, SO BUT...

17 Q OKAY. OKAY.

18 A REPORTS.

19 Q I'M GLAD SOMEBODY REMEMBERS WHAT I SAY.

20 OKAY. SO THERE WERE CERTAIN INCIDENTS, I
21 BELIEVE, LIKE THE ONE WHERE MR. WEISMAN SAID THAT MS.
22 REEVES WAS CHOKING.

23 DO YOU RECALL THAT?

24 A I DO.

25 Q OKAY. AND I'M SORRY IF I MISSED THIS, BUT
26 READING MS. REEVES' TESTIMONY, HOW DID IT CHANGE YOUR
27 PERCEPTION OF HER DIAGNOSIS?

28 A IN NO WAY DID IT CHANGE MY PERCEPTION OF HER

1 DIAGNOSIS.

2 Q AND DID YOU CHANGE YOUR TESTIMONY HERE IN ANY
3 WAY?

4 A NO.

5 Q OKAY. SO THIS IS THE SAME TESTIMONY YOU WOULD
6 HAVE GIVEN BEFORE YOU READ MS. REEVES' TESTIMONY AND THE
7 TESTIMONY OF OTHER WITNESSES; CORRECT?

8 A REGARDING HER DIAGNOSIS, YES.

9 Q OKAY. AND HOW ABOUT REGARDING HER PROGNOSIS?
10 ANY EFFECT?

11 A NO.

12 Q NOW, YOU TOLD US THAT THE TESTIMONY THAT YOU READ
13 WAS PROVIDED TO YOU BY MS. REEVES' COUNSEL.

14 DO YOU RECALL THAT?

15 A YES.

16 Q AND THAT MS. REEVES' COUNSEL TOLD YOU IT WASN'T
17 NECESSARY TO READ MR. DAVID'S DEPOSITION TESTIMONY;
18 CORRECT?

19 A CORRECT.

20 Q AND THAT YOU READ A LITTLE BIT OF MR. DAVID'S
21 TRIAL TESTIMONY BECAUSE IT WAS IN THE SAME BOOKLET --
22 THE SAME TRANSCRIPT AS MS. REEVES; CORRECT?

23 A CORRECT.

24 Q DON'T YOU THINK IT WOULD HAVE BEEN IMPORTANT TO
25 SEE BOTH SIDES OF THE EVIDENCE BEFORE TESTIFYING?

26 A WELL, THAT WAS WHY I INITIALLY REQUESTED HIS
27 DEPOSITION TESTIMONY.

28 Q BUT YOU WERE TOLD IT WASN'T IMPORTANT TO READ;

1 CORRECT?

2 A IT WAS NOT NECESSARY. AND YOU MIGHT RECALL, I
3 WAS ON VACATION AT THE TIME, SO I WAS NOT REALLY EAGER
4 TO SPEND A LONG AMOUNT OF TIME ON THIS IF IT WASN'T
5 NECESSARY.

6 Q SO YOU WERE TOLD IT WAS NOT NECESSARY. YOU WERE
7 TOLD BY COUNSEL THAT IT WAS NOT NECESSARY FOR YOU TO
8 CONSIDER THE OTHER SIDE OF THE STORY PRIOR TO YOUR
9 TESTIMONY; CORRECT?

10 A CORRECT.

11 Q AND ISN'T IT POSSIBLE, DR. MEYER, THAT YOU MIGHT
12 HAVE FOUND OR DISCOVERED FACTS IN TESTIMONY FAVORABLE TO
13 MR. DAVID THAT YOU HAD NOT KNOWN FROM WHAT MS. REEVES
14 TOLD YOU?

15 A THERE COULD BE ALL KINDS OF THINGS, CORRECT.

16 Q AND ISN'T IT POSSIBLE THAT THOSE FACTS MAY HAVE
17 CHANGED YOUR PERCEPTION OF THE ACCURACY OF THE THINGS
18 MS. REEVES TOLD YOU DURING HER SESSIONS WITH YOU?

19 A NO -- UNLIKELY, VERY UNLIKELY.

20 Q UNLIKELY BECAUSE THE OTHER SIDE OF THE STORY
21 DIDN'T MATTER?

22 A NO, BECAUSE SHE WAS MY CLIENT.

23 Q OKAY.

24 A AND I KNEW HER QUITE WELL.

25 Q SO IF YOU READ THE TESTIMONY OF THREE OR FOUR
26 PEOPLE WHO SAID THAT SOMETHING MS. REEVES TOLD YOU WAS
27 INACCURATE, YOU WOULD HAVE BELIEVED MS. REEVES?

28 A I CAN'T SAY THAT. THAT'S A HYPOTHETICAL.

1 Q NOW, YOU KNEW THAT MS. REEVES WORKED OR AT LEAST
2 ATTEMPTED TO WORK AS AN ACTRESS; CORRECT?

3 A CORRECT.

4 Q AND I BELIEVE THAT ONE OF THE THINGS YOU SAID
5 DURING THE DEPOSITION WAS THAT ONE OF MS. REEVES' COPING
6 MECHANISMS AS A CHILD -- YOU RECALL WE TALKED ABOUT WHAT
7 I CALL ABUSE SHE SUFFERED AS A CHILD?

8 A I DO RECALL.

9 Q OKAY. AND YOU TOLD US THAT ONE OF THE COPING
10 MECHANISMS WAS TO DENY; CORRECT?

11 A CORRECT.

12 Q DENY REALITY; CORRECT?

13 A NO, NOT DENY REALITY.

14 Q DENY THE EMOTIONS THAT SHE SUFFERED AS A RESULT
15 OF THE REALITY; CORRECT?

16 A YES.

17 Q AND THAT PRE --

18 A BIG DISTINCTION.

19 Q AND THAT PRETENSE WAS ANOTHER COPING MECHANISM;
20 ISN'T THAT CORRECT?

21 A NO, THAT'S INCORRECT. I DON'T BELIEVE I USED
22 THAT WORD AT ALL.

23 Q OKAY. I WANT TO GO BACK FOR A MINUTE BECAUSE I
24 DON'T THINK WE FINISHED ABOUT MS. -- TO MS. REEVES'
25 TESTIMONY THAT BY DECEMBER 2017 OR THEREABOUTS, SHE WAS
26 SUICIDAL.

27 DO YOU RECALL THAT?

28 A I DO.

1 Q AND YOU READ THAT IN MS. REEVES' TESTIMONY, DID
2 YOU NOT?

3 A ACTUALLY, I MADE A DISTINCTION. SHE SAID SHE
4 WANTED TO DIE, WHICH IS DIFFERENT THAN BEING SUICIDAL.

5 Q MS. REEVES' DEPOSITION TESTIMONY -- WELL, STRIKE
6 THAT.

7 MS. REEVES' TRIAL TESTIMONY, YOU READ THAT;
8 CORRECT?

9 A CORRECT.

10 Q AND MS. REEVES TALKED ABOUT BEING SUICIDAL IN
11 DECEMBER 2016.

12 DO YOU RECALL THAT?

13 A I DO. BUT YOU ACTUALLY SAID 2017 WHEN YOU
14 INTRODUCED THIS.

15 Q I AM SORRY, I MIX UP THE YEARS ALL THE TIME.
16 THANK YOU.

17 OKAY. 2016.

18 AND THAT SHE HAD, IN FACT, PLANNED IT OUT AND
19 CHOSEN A PLACE TO DRIVE A CAR OFF A CLIFF.

20 DO YOU RECALL THAT?

21 A I DO.

22 Q AND YOU ALSO TOLD US THAT THAT WAS SOMETHING SHE
23 DIDN'T TELL YOU BECAUSE SHE MAY NOT HAVE TRUSTED YOU
24 SUFFICIENTLY AT THE TIME; CORRECT?

25 A THAT WAS ONE REASON. I PUT FORTH ANOTHER REASON
26 AS WELL.

27 Q AND WHAT WAS THE SECOND REASON?

28 A WAS THAT WHEN I START WITH A CLIENT, I LET THEM

1 KNOW THE LIMITS OF CONFIDENTIALITY AND ONE OF THE LIMITS
2 WAS KEEPING SOMETHING PRIVATE IS IF SOMEONE'S A DANGER
3 TO THEMSELVES OR OTHERS, THEN I MIGHT NOT KEEP IT
4 PRIVATE, SO THAT WOULD BE ANOTHER MOTIVATION TO NOT TELL
5 ME.

6 Q OKAY. SO IF I UNDERSTANDING YOU CORRECTLY, WHEN
7 YOU BEGAN TREATING MS. REEVES IN 2016, LATE 2016, YOU
8 TOLD HER THAT YOU COULDN'T KEEP CONFIDENTIAL ANYTHING
9 SHE TOLD YOU ABOUT WANTING TO HARM HERSELF; IS THAT
10 CORRECT?

11 A NO, I TOLD HER I COULD -- HAD A LEGAL OBLIGATION
12 TO SPEAK OUT IF I THOUGHT SHE WAS IN DANGER OF HURTING
13 HERSELF, WHICH IS A LITTLE DIFFERENT THAN WHAT YOU SAID.

14 Q DID YOU TELL HER THAT IN THE VERY FIRST SESSION
15 OF DECEMBER OF 2016?

16 A YES.

17 Q OKAY. AND DO YOU THINK BASED ON THAT THERE MAY
18 HAVE BEEN OTHER THINGS MS. REEVES DIDN'T DISCLOSE TO
19 YOU?

20 A I DON'T KNOW.

21 Q MS. REEVES DID NOT TELL YOU, HER PSYCHOLOGIST,
22 THAT SHE WAS CONTEMPLATING SUICIDE; ISN'T THAT CORRECT?

23 A AS OF SESSIONS ONE AND TWO, CORRECT.

24 Q OTHER THAN AT ONE POINT SAYING SOMETIMES SHE FELT
25 SHE'D LIKE TO DIE, DID MS. REEVES EVER TELL YOU THAT SHE
26 WAS ACTUALLY CONTEMPLATING SUICIDE?

27 A NO.

28 Q SO, LET'S SAY, A YEAR LATER, MS. REEVES DIDN'T

1 SAY, BY THE WAY, I DIDN'T TELL YOU THIS THEN, BUT BACK
2 IN 2016, I HAD ACTUALLY PICKED A CLIFF TO DRIVE OFF?
3 NEVER TOLD THAT YOU; RIGHT?

4 A CORRECT.

5 Q AND, OF COURSE, AS YOU SIT HERE TODAY, YOU DON'T
6 KNOW WHAT ELSE MS. REEVES KEPT FROM YOU, DO YOU?

7 A CORRECT.

8 Q AND IN YOUR TREATMENT OF MS. REEVES, YOU -- WELL,
9 STRIKE THAT.

10 YOU TOLD US THAT MUCH OF YOUR TREATMENT IS BASED
11 ON OBSERVATION.

12 A CORRECT.

13 Q OKAY. AND THAT WOULD BE OBSERVING THE PATIENT
14 AND DRAWING CERTAIN CONCLUSIONS; CORRECT?

15 A IN CONJUNCTION WITH WHAT THEY SAY.

16 Q AND YOU NEVER OBSERVED THAT MS. REEVES WAS SO IN
17 DISTRESS THAT SHE WAS SUICIDAL; ISN'T THAT CORRECT?

18 A I DON'T KNOW THAT THAT'S SOMETHING A PERSON CAN
19 OBSERVE. I CERTAINLY OBSERVED THAT SHE WAS VERY
20 DEPRESSED. I DON'T THINK YOU CAN OBSERVE IF SOMEBODY
21 WANTS TO KILL THEMSELVES VISUALLY.

22 Q ALL RIGHT.

23 A UNLESS THERE'S A WEAPON AND THEN, YEAH.

24 Q AND IN LATE 2016, EARLY 2017, YOUR OBSERVATIONS
25 OF MS. REEVES AND WHAT MS. REEVES WAS TELLING YOU DID
26 NOT CAUSE YOU TO BE ALARMED THAT MS. REEVES WAS
27 CONTEMPLATING SUICIDE; ISN'T THAT RIGHT?

28 A THAT'S CORRECT.

1 Q BECAUSE IF YOU THOUGHT THAT MS. REEVES WAS
2 CONTEMPLATING SUICIDE, THAT WAS SOMETHING YOU WOULD HAVE
3 TO TAKE MEASURES TO ADDRESS SUCH AS REPORTING IT,
4 GETTING MEDICAL HELP, WHAT WOULD YOU HAVE TO DO?

5 A I WOULDN'T HAVE TO DO ANYTHING. THE FIRST THING
6 I WOULD DO IS DISCUSS IT WITH HER AND THEN WE WOULD MAKE
7 A PLAN AND USUALLY WE'D MAKE A PACT, WHETHER SHE HAD
8 IMPULSES AND URGES THAT SHE WOULD CONTACT ME, WE WOULD
9 MAKE A PLAN TO TRY TO KEEP HER SAFE. IF I FELT THAT WAS
10 NOT GOING TO -- IF SHE WASN'T CREDIBLE OR WE COULDN'T DO
11 THAT, WELL, THEN I WOULD GO SOMEWHERE ELSE.

12 Q OKAY. SO A FEW MINUTES AGO -- A FEW MOMENTS AGO,
13 YOU TOLD ME THAT YOU EXPLAINED TO MS. REEVES THAT YOU
14 COULDN'T KEEP IT CONFIDENTIAL IF YOU FELT --

15 A UM-HMM.

16 Q -- SHE WAS A DANGER TO HERSELF OR OTHERS;
17 CORRECT?

18 A COULDN'T NECESSARILY, YES. I WAS ALLOWED TO
19 BREAK CONFIDENTIALITY.

20 Q OH, OKAY.
21 AND THAT'S WHAT YOU EXPLAINED TO MS. REEVES?

22 A WELL, AGAIN, YES, THAT'S WHAT I TYPICALLY EXPLAIN
23 TO SOMEBODY WHO COMES INTO MY OFFICE SO THEY UNDERSTAND
24 THE LIMITS OF THEIR PRIVACY.

25 Q AND AT ANY POINT IN TIME, DID YOU BELIEVE THAT
26 MS. REEVES WAS IN IMMINENT DANGER OF COMMITTING SUICIDE?

27 A NO, I DID NOT BELIEVE SHE WAS IN IMMINENT DANGER.

28 Q NOW, I WANT TO TALK A LITTLE BIT ABOUT A WORD YOU

1 USED, "HYPERVIGILANT."

2 DO YOU RECALL THAT?

3 A I DO.

4 Q OKAY. AND HYPERVIGILANT, TELL US WHAT
5 HYPERVIGILANT MEANS IN WORDS THAT WE CAN ALL UNDERSTAND.

6 A WELL, BEING VIGILANT IS BEING CAUTIOUS AND
7 HYPERVIGILANT IS BEING VERY, VERY CAUTIOUS -- OVERLY
8 CAUTIOUS.

9 Q AND IS IT YOUR PROFESSIONAL OPINION THAT WHEN MS.
10 REEVES WAS UNDERGOING WHAT YOU DESCRIBED IN YOUR NOTES
11 AS WHIPPINGS AND HARSH PUNISHMENT FROM HER FATHER, THAT
12 SHE WAS HYPERVIGILANT AS A RESULT?

13 A AT THAT TIME? I DON'T KNOW.

14 Q YOU DON'T KNOW. OKAY.

15 SAME QUESTION FOR WHEN SHE WAS BEING PHYSICALLY
16 AND EMOTIONALLY ABUSED BY T.J.

17 DID SHE REACT WITH HYPERVIGILANCE?

18 A NO, I DON'T THINK SHE DID AT THAT POINT.

19 Q AND YOU DIDN'T KNOW MS. REEVES AT THE TIME?

20 A NO.

21 Q SO WHAT DO YOU BASE THAT ON?

22 A OUR CONVERSATIONS AND THE FACT THAT SHE SEEMED,
23 IF ANYTHING, TO BE ON THE OTHER EXTREME, LESS VIGILANT
24 THAN WOULD HAVE BEEN ADAPTED.

25 Q AND THAT'S WHAT SHE TOLD YOU?

26 A THAT WAS MY CLINICAL IMPRESSION.

27 Q OKAY. BUT YOU DIDN'T TREAT HER AT THE TIME THAT
28 SHE WAS WITH T.J. OR SHORTLY THEREAFTER; CORRECT?

1 A CORRECT.

2 Q OKAY. SO IF SHE TOLD YOU SHE WAS NOT
3 HYPERVIGILANT AFTER LEAVING T.J., YOU WOULDN'T KNOW
4 WHETHER THAT WAS TRUE OR NOT, WOULD YOU?

5 A NO, SHE DIDN'T TELL ME SHE WASN'T HYPERVIGILANT.
6 THIS IS, AGAIN, MY PROFESSIONAL OPINION. LISTENING TO
7 HER TALK ABOUT HOW SHE WAS AT THAT TIME, IT SEEMED TO ME
8 -- HER -- SHE WAS IGNORING DANGER RATHER THAN OVERLY
9 ALERT TO DANGER IN MANY RESPECTS.

10 Q OKAY. SO AFTER T.J. AND AFTER HER EXPERIENCES AS
11 A CHILD, YOU DON'T BELIEVE SHE SUFFERED HYPERVIGILANCE
12 UNTIL AFTER SHE LEFT FILMON; IS THAT CORRECT?

13 A CORRECT.

14 Q OKAY. AND WHEN A PATIENT IS IN DENIAL AND I
15 THINK YOU TOLD US THAT SHE WAS IN DENIAL BEFORE SHE CAME
16 TO FILMON WITH RESPECT TO THE WAY SHE HAD BEEN TREATED
17 AS A CHILD; CORRECT?

18 A NO, YOU KEEP MISCHARACTERIZING THAT. I SAID SHE
19 WAS DENYING HER FEELINGS. SHE WASN'T IN DENIAL ABOUT
20 WHAT HAPPENED. I THINK SHE WAS DENYING THE INTENSITY OF
21 HER FEELINGS. THAT'S A BIG DIFFERENCE. IN DENIAL MEANS
22 IT DIDN'T HAPPEN. SHE WAS QUITE CLEAR ABOUT WHAT
23 HAPPENED OR SHE DESCRIBED THINGS QUITE CLEARLY. IT WAS
24 THE IMPACT THAT IT SEEMS SHE WAS NOT CONNECTING TO.

25 Q HERE'S WHAT I'D LIKE YOU TO EXPLAIN.

26 HOW DO YOU KNOW THAT MS. REEVES WAS NOT IN DENIAL
27 ABOUT ADDITIONAL BEATINGS BY HER FATHER, ADDITIONAL
28 ABUSE, THINGS SHE DID NOT TELL YOU ABOUT, BUT WAS NOT

1 RECOGNIZING, WAS IN DENIAL OVER?

2 A SO I'VE BEEN WORKING WITH VICTIMS FOR 40 YEARS, I
3 HAVE TWO ADVANCED DEGREES, I WENT TO ONE OF THE BEST
4 UNIVERSITIES IN THE COUNTRY, I'M A VERY, VERY SERIOUS
5 PERSON WHEN IT COMES TO MY WORK AND I HAVE A LOT OF
6 EXPERIENCE IN THIS REALM.

7 SO I'M RELYING ON MY PROFESSIONAL JUDGMENT WHEN I MAKE
8 THOSE STATEMENTS.

9 Q OKAY. AND GIVEN YOUR VERY IMPRESSIVE RESUME, IT
10 WAS FORTUNATE THAT MS. REEVES GOT TO YOU INSTEAD OF
11 SOMEBODY ELSE FOR TREATMENT; CORRECT?

12 A I MEAN, SHE MIGHT HAVE BEEN ABLE TO GET TO
13 SOMEONE BETTER THAN ME, I CAN'T SAY THAT FOR SURE, BUT
14 SHE CERTAINLY COULD HAVE GOTTEN SOMEONE WORSE THAN ME.

15 Q OKAY. BUT IF SOMEBODY IS IN THE CONDITION MS.
16 REEVES REPORTED SHE WAS IN --

17 A UM-HMM.

18 Q -- YOU'RE THE ONE TO GO TO, AREN'T YOU?

19 A I WOULD SAY THAT I AM AN EXPERT IN THIS AREA,
20 YES.

21 Q AND THAT'S BECAUSE YOUR EXPERIENCE AND YOUR
22 TRAINING MAKE YOU ABLE TO BETTER TREAT A PATIENT --

23 A UM-HMM.

24 Q -- SUFFERING MS. REEVES' ALLEGED SYMPTOMS;
25 CORRECT?

26 A I WOULD DISPUTE THE ALLEGED.

27 Q CAN YOU ANSWER MY QUESTION?

28 A WELL, IF YOU TOOK OUT ALLEGED, I WOULD AGREE.

1 Q OKAY. AND, IN FACT, YOU MADE SIGNIFICANT
2 PROGRESS WITH MS. REEVES, DID YOU NOT?

3 A I THINK SO.

4 Q OKAY. AND WE'RE GOING TO GO BACK TO THAT IN A
5 MINUTE AND TALK ABOUT WHAT YOU TALKED ABOUT, BUT I WANT
6 TO DISCUSS SOMETHING ELSE FIRST.

7 WHAT IS TRANSFERENCE?

8 A TRANSFERENCE IS A PHENOMENON IN WHICH EXPERIENCES
9 THAT YOU HAVE AS A CHILD WITH THE PEOPLE WHO YOU GROW UP
10 WITH CREATE ASSUMPTIONS ABOUT HOW PEOPLE ARE AND THEN
11 YOU TRANSFER THOSE ASSUMPTIONS ABOUT HOW PEOPLE ARE TO
12 OTHER PEOPLE THAT YOU MEET.

13 Q OKAY. IS THAT DIFFERENT FROM PROJECTING?

14 A YES, IT IS.

15 Q IS THERE A WAY YOU CAN EXPLAIN THE DIFFERENCE?

16 A SO IN TRANSFERENCE, LET'S SAY, YOU GROW UP AND
17 YOU'VE GOT A REALLY STRICT FATHER, OKAY. AND HE'S VERY
18 AUTHORITARIAN AND YOU, THEREFORE, WHEN YOU SEE SOME --
19 ANOTHER MAN, YOU IMAGINE THAT HE MIGHT BE THE SAME WAY
20 OR MIGHT HAVE HARSH PROCLIVITIES -- TENDENCY.

21 WITH PROJECTION, IT'S THAT YOU HAVE A FEELING
22 INSIDE YOU THAT YOU CAN'T MANAGE, YOU DON'T WANT TO FEEL
23 THE WAY YOU FEEL. AND INSTEAD OF OWNING THAT YOU FEEL
24 THAT WAY, YOU IMAGINE OTHER PEOPLE FEEL THAT WAY. SO
25 IT'S NOT BASED ON YOUR EXPERIENCE, IT'S BASED ON YOUR
26 DISCOMFORT WITH YOUR OWN FEELINGS.

27 Q OKAY. SO IF I AM TENSE, I HAVE A TENDENCY TO
28 LOOK AND SAY, OH, ALL YOU PEOPLE LOOK TENSE, THAT'S

1 PROJECTION; RIGHT?

2 A YES.

3 Q AND TRANSFERENCE IS I THINK MEN ARE DANGEROUS AND
4 THEREFORE, MR. GOLDBERG IS A DANGEROUS MAN; IS THAT
5 RIGHT?

6 A BASED ON YOUR EARLY EXPERIENCES --

7 Q OKAY.

8 A -- OF FINDING MEN DANGEROUS, YES.

9 Q OKAY. NOW, I WANT TO GO BACK TO YOUR NOTES
10 WHICH --

11 MR. GOLDBERG: 104.

12 MS. GAROFALO: 104, EXHIBIT 104 AND I'D LIKE TO
13 GO TO PAGE 23, IF WE CAN.

14 MR. GOLDBERG: DO YOU NEED THE...

15 MS. GAROFALO: OH, TAKE YOUR TIME, I APOLOGIZE.

16 THE WITNESS: I WOULD LIKE TO -- IT'S HARD FOR ME
17 TO TURN.

18 MS. LEAL: MAY I GET THE CLERK'S COPY?

19 HON. T.A. GREEN: MR. CLERK, I THINK WE NEED YOUR
20 COPY FOR SOMETHING.

21 MS. LEAL: 104.

22 MR. GOLDBERG: I CAN GIVE HER MINE.

23 THE WITNESS: I CAN TURN, IF NEED BE.

24 MR. GOLDBERG: I CAN GIVE HER MINE.

25 THE WITNESS: I CAN JUST MOVE MY CHAIR.

26 MS. LEAL: I FOUND IT. WE FOUND IT.

27 HON. T.A. GREEN: YEAH, I THINK WE HAVE IT.

28 MR. GOLDBERG: YOU GOT IT?

1 THE WITNESS: THANK YOU. WHAT PAGE IS THIS NOW?

2 MS. GAROFALO:

3 Q OKAY. SO WE'RE GOING TO START WITH PAGE 23.

4 A OKAY.

5 Q ARE YOU THERE YET?

6 A I AM.

7 Q ALL RIGHT. SO CLOSE DOWN -- WELL, ON THE SCREEN
8 UNDER B, DO YOU SEE WHERE IT SAYS, "NIGHTMARES"?

9 A UM-HMM, YES.

10 Q AND THEN UNDERNEATH THAT, IT SAYS, "HAD FEAR T.J.
11 MIGHT KILL HER."

12 A UM-HMM.

13 Q "VERY FRIGHTENED."

14 AND WHAT'S THE WORD WE SEE?

15 A "ALKI MIGHT KILL HER."

16 Q "ALKI MIGHT KILL HER."

17 "ALKI SEEMED MORE REALISTIC THAT HE MIGHT KILL
18 HER."

19 A UM-HMM.

20 Q SO HERE YOU'RE COMPARING MS. REEVES' FEELINGS
21 ABOUT T.J. WHO THREATENED TO KILL HER --

22 A YES.

23 Q -- WITH MR. DAVID AND HER FEAR THAT HE WOULD KILL
24 HER; CORRECT?

25 A CORRECT.

26 Q IS THIS TRANSFERENCE?

27 A I DON'T THINK SO.

28 Q ARE YOU AWARE OF ANY -- STRIKE THAT.

1 DID MS. REEVES TELL YOU THAT MR. DAVID EVER,
2 OTHER THAN THE ONE LITTLE NOTE WE'VE SEEN, TRIED TO
3 CONTACT HER?

4 A NO.

5 Q DID MS. REEVES TELL YOU THAT MR. DAVID HAD EVER
6 THREATENED TO KILL HER?

7 A NO.

8 Q BUT T.J. THREATENED TO KILL HER, DIDN'T HE?

9 A CORRECT.

10 Q AND T.J. WAS PHYSICALLY VIOLENT, WASN'T HE?

11 A CORRECT.

12 Q AND YOU ARE COMPARING T.J. IN THIS NOTE?

13 A UM-HMM.

14 Q BASED ON WHAT MS. REEVES WAS TELLING YOU --

15 A UM-HMM.

16 Q -- TO MR. DAVID; CORRECT?

17 A I'M COMPARING HER FEAR WITH T.J. TO HER FEAR WITH
18 MR. DAVID.

19 Q NOW, LET'S LOOK AT PAGE 15, IF WE MIGHT.

20 A READY.

21 Q OKAY. AND AT THE TOP, AGAIN, WE HAVE NOTES IN
22 WHICH MS. REEVES IS TALKING ABOUT T.J. WHO PHYSICALLY
23 ASSAULTED HER?

24 A UM-HMM.

25 Q AND EMOTIONALLY ABUSED HER?

26 A CORRECT.

27 Q AND MR. DAVID IN THE SAME PASSAGES; CORRECT?

28 A CORRECT.

1 Q AND I ASSUME WHEN YOU SAY, "SHE WAS FRIGHTENED,"
2 YOU ARE TALKING ABOUT MS. REEVES?

3 A CORRECT.

4 Q "SHE WAS FRIGHTENED THAT HER BOSS WOULD TRY TO
5 HURT HER, LEFT T.J."
6 AND WHAT'S NEXT WORD?

7 A I'M NOT SURE.

8 Q AND WHAT?

9 A I DON'T KNOW.

10 Q OKAY. "MET T.J." AND SOMETHING?

11 A "AND LEFT."

12 Q "AND LEFT T.J."?

13 A I THINK. LEFT SOMETHING.

14 Q "SIMILAR FEELING, UNSAFE"?

15 A UM-HMM.

16 Q "PARANOID, WORRIED SHE WAS CRAZY TO FEEL THIS
17 WAY"?

18 A CORRECT.

19 Q AND MS. REEVES IS TELLING YOU THAT SHE WAS
20 WORRIED THAT SHE WAS CRAZY TO FEEL PARANOID ABOUT T.J.
21 AND MR. DAVID?

22 A NO, ABOUT MR. DAVID.

23 Q RIGHT.

24 A NOT T.J.

25 Q OKAY.

26 SO SHE WAS CONCERNED THAT SHE WAS FEELING
27 PARANOID ABOUT MR. DAVID?

28 A CORRECT.

1 Q AND THAT WAS IN THE SAME SENTENCE THAT SHE WAS
2 TALKING ABOUT HER FEAR OF T.J.; CORRECT?

3 A CORRECT.

4 Q ISN'T THIS INDICATIVE OF TRANSFERENCE?

5 A WELL, THE REASON I DON'T SEE IT AS TRANSFERENCE
6 IS -- I MEAN, T.J. THREATENED HER AND MR. DAVID
7 ASSAULTED HER, SO TRANSFERENCE IS WHEN THERE'S REALLY NO
8 BASIS TO TRANSFER IT. BUT IN THIS CASE, MAKING THE
9 ASSOCIATION MADE A LOT OF SENSE BECAUSE MR. DAVID HAD
10 BEEN VIOLENT WITH HER, HAD THREATENED HER, HAD TRIED TO
11 DOMINATE HER, HAD TRIED TO HUMILIATE HER, SO IT DOESN'T
12 SEEM TO ME LIKE IT'S TRANSFER. IT SEEMS TO ME THEY'RE
13 SIMILAR, SHE'S HAD A FEELING OF FRIGHT BEFORE, BUT IT
14 DOESN'T SEEM TO ME LIKE IT'S TRANSFERENCE.
15 BECAUSE IN TRANSFERENCE, YOU CAN ANALYZE AWAY THE PART
16 THAT'S COMPLETELY UNREALISTIC. AND IN THIS CASE, THAT
17 WASN'T NECESSARILY THE CASE.

18 Q AND WHAT PHYSICAL VIOLENCE BY MR. DAVID --
19 ALLEGEDLY BY MR. DAVID, ARE YOU REFERRING TO?

20 A THE TRYING TO CHOKE HER, THE PUTTING HER HEAD
21 BETWEEN HIS LEGS, HOLDING HER -- HOLDING HER SO THAT SHE
22 WAS HELPLESS.

23 Q OKAY. ANYTHING VIOLENT IN THE WAY THAT T.J. WAS
24 VIOLENT, SOMETHING THAT MIGHT BRUISE, SOMETHING -- ANY
25 CONDUCT BY MR. DAVID THAT WAS INTENDED TO PHYSICALLY
26 HURT MS. REEVES THAT YOU KNOW ABOUT?

27 A WELL, AS OF NOW, YES, I THINK THE CHOKING HER
28 WAS, YES.

1 Q OKAY. BUT YOU DIDN'T KNOW THAT AT THE TIME;
2 RIGHT?

3 A I -- I DID NOT KNOW AT THE TIME.

4 Q YOU ONLY LEARNED THAT FROM READING MR. WEISMAN'S
5 --

6 A AND MS. REEVES' TESTIMONY.

7 Q -- TESTIMONY?

8 A YES.

9 Q BUT BEFORE THIS TRIAL, THAT WAS NOTHING THAT MS.
10 REEVES TOLD YOU ABOUT; CORRECT?

11 A WELL, SHE HAD TOLD ME ABOUT IT, BUT NOT -- I
12 DIDN'T HAVE THE SENSE OF THE ENORMITY OF THE VIOLENT AND
13 OF THE MENACE.

14 Q SO ONLY TRIAL TESTIMONY. HERE AT TRIAL WHEN MS.
15 REEVES IS TRYING TO CONVINCING A JURY OF HER CASE, DID YOU
16 LEARN THAT THERE WAS ONE INCIDENT OF ALLEGED PHYSICAL
17 VIOLENCE ON MS. REEVES; ISN'T THAT RIGHT?

18 A NO, THAT'S NOT RIGHT.

19 Q AND LET'S GO BACK TO MS. REEVES' FATHER FOR A
20 MOMENT AND HER FEELINGS OR HER FEARS THAT HAD BEEN
21 SUPPRESSED MIGHT ALSO NOT BE TRANSFERRED ONTO MEN IN HER
22 LIFE; CORRECT?

23 A THERE WASN'T EVIDENCE TO THAT EFFECT. ARE WE
24 GOING WITH A HYPOTHETICAL OR WITH MS. REEVES? WITH MS.
25 REEVES, SHE WENT ON TO HAVE RELATIONSHIPS WITH MEN THAT
26 DID NOT SEEM TO BE IMPACTED EXCEPT WHEN SHE STAYED WITH
27 A VIOLENT MAN.

28 Q OKAY. AS A DIAGNOSTICIAN YOU KNOW THAT THAT'S

1 POSSIBLE; ISN'T THAT CORRECT?

2 A AGAIN, WE WENT THROUGH THIS THE OTHER DAY. DO
3 YOU WANT MY EXPERT OPINION ABOUT PEOPLE IN GENERAL OR
4 ARE WE DISCUSSING MS. REEVES SPECIFICALLY?

5 Q I AM ASKING YOU SPECIFICALLY WITH RESPECT TO MS.
6 REEVES, THE VIOLENCE, THE PHYSICAL VIOLENCE RESTED ON
7 MS. REEVES AS A CHILD BY HER FATHER COULD CAUSE
8 FEELINGS, EVEN THOUGH SUPPRESSED, OF MISTRUST IN MEN;
9 ISN'T THAT RIGHT?

10 A THERE WASN'T EVIDENCE FOR THAT. I KNOW YOU'D
11 LIKE ME TO SAY YES, BUT SHE WENT ON TO HAVE
12 RELATIONSHIPS WITH MEN THAT DIDN'T INVOLVE THAT, SHE
13 DIDN'T SEEM FRIGHTENED OF MEN. IF ANYTHING, SHE WAS
14 LESS FRIGHTENED THAN SHE SHOULD HAVE BEEN RATHER THAN
15 MORE FRIGHTENED.

16 SO UNTIL HER PSYCHIC STRUCTURE BROKE, SHE WAS NOT
17 PAYING ATTENTION TO ALARMS, QUITE THE OPPOSITE OF WHAT
18 YOU'RE SUGGESTING.

19 Q SO WHEN YOU TALK ABOUT HER -- WHEN I LISTENED TO
20 YOU TALK ABOUT HER PSYCHIC STRUCTURE BREAKING --

21 A UM-HMM.

22 Q -- IT'S ALMOST LIKE, TO ME, THE IMAGE IS THERE'S
23 A DAM AND ALL OF THIS IS WALLED UP SOMEWHERE IN MS.
24 REEVES' MIND AND THEN THE DAM BROKE; IS THAT A CORRECT
25 ANALOGY?

26 A WELL, PEOPLE CAN HAVE PTSD WHEN THERE'S NO
27 PREVIOUS DAM, SO I WOULDN'T SAY THAT'S NECESSARILY THE
28 CASE. IN FACT, ANYONE CAN GET PTSD. YOU'RE MORE

1 VULNERABLE IF YOU'VE HAD CERTAIN EXPERIENCES IN YOUR
2 LIFETIME AND I THINK THAT'S WHAT YOU'RE TRYING TO
3 SUGGEST.

4 Q OKAY. LET'S TALK ABOUT. HANG ON ONE MINUTE.
5 I'M TRYING TO NARROW THIS DOWN.
6 LET'S JUST LOOK AT ONE MORE PAGE IN EXHIBIT 104,
7 PAGE 29.

8 AND THE SECOND SENTENCE YOU SAY, AND AGAIN, THIS
9 IS, I ASSUME, SOMETHING THAT MS. REEVES TOLD YOU "LIVING
10 WITH T.J. AGAIN, SEEMS" CAN YOU READ THAT FOR US?

11 A "YEARS LATER COULDN'T GET OUT." THIS, AGAIN, I
12 THINK IS A DREAM.

13 Q OKAY. SO HERE WE ARE IN OCTOBER OF 2017, DO I
14 HAVE THE DATE RIGHT?

15 A LOOKS GOOD.

16 Q OKAY. SEVEN YEARS AFTER SHE LEFT T.J.?

17 A UM-HMM. CORRECT.

18 Q AND SHE STILL FEELS SHE'S STILL THINKING ABOUT
19 HIM, HAVING NIGHTMARES ABOUT HIM AND THINKING THAT SHE
20 COULDN'T GET OUT; IS THAT CORRECT?

21 A IT'S STILL IN HER UNCONSCIOUS. THIS WAS A DREAM,
22 A NIGHTMARE, SO SHE'S HAVING NIGHTMARES BECAUSE SHE'S
23 TRAUMATIZED AND OLD FEARS -- FEARFUL STATES ARE
24 REEMERGING.

25 Q OKAY. SO OLD --

26 A THE SYMBOLISM IN THE DREAM OF HAVING SOMEBODY
27 WHO'S THREATENING TO KILL YOU IS RE-EMERGING, SHE'S HAD
28 THAT EXPERIENCE, IT'S A POTENT SYMBOL, SO IT'S COMING UP

1 AGAIN.

2 Q OKAY. SHE HAD THAT EXPERIENCE WITH T.J.?

3 A YES.

4 Q AS FAR AS YOU KNOW, MR. DAVID NEVER THREATENED TO
5 KILL MS. REEVES?

6 A I WAS REFERRING TO T.J. WITH THAT.

7 Q OKAY.

8 A I THINK WE HAD DISCUSSED IN THE DEPOSITION, IT
9 WAS IN HER BODY --

10 Q THANK YOU. THERE'S NO QUESTION PENDING.

11 A -- AND HER MIND.

12 HON. T.A. GREEN: YEAH, QUESTION.

13 MS. GAROFALO: THANK YOU. THERE'S NO QUESTION
14 PENDING, MS. MEYER.

15 MS. LEAL: DR. MEYER.

16 THE WITNESS: THANK YOU.

17 MS. GAROFALO:

18 Q NOW, IN ADDITION TO HAVING DIFFICULTIES TRUSTING
19 MEN DURING THE PERIOD OF TIME MS. REEVES WAS SEEING YOU,
20 MS. REEVES IS HAVING DIFFICULTIES WITH OTHERS IN THE
21 WORKPLACE; CORRECT?

22 A I'M NOT SURE WHAT YOU'RE REFERRING TO.

23 Q OKAY. WELL, LET'S START WITH PAGE 24 IN
24 EXHIBIT 104.

25 AND TAKE IT DOWN A LITTLE BIT HERE. FURTHER DOWN.

26 OKAY.

27 AND YOU SAY HERE, MS. REEVES -- AGAIN, THIS IS
28 WHAT MS. REEVES IS TELLING YOU; CORRECT?

1 A I'M NOT SURE WHAT YOU'RE REFERRING TO YET, SO.

2 Q WELL, WHATEVER THE NOTES ARE, FAIR ENOUGH.

3 IT SAYS, "HAVING AN ENEMY WHO PLOTS AGAINST HER."

4 A UM-HMM.

5 Q "SOMEONE WHO'S BEEN A REAL FRIEND."

6 A UM-HMM.

7 Q "LR STILL," WHAT'S THAT WORD?

8 A "CHECKS ON HER A FEW TIMES A WEEK."

9 Q OKAY. "IS SHE STILL PLOTTING AGAINST ME?"

10 AND CAN WE GO UP TO THE TOP AND SEE IF WE CAN SEE THE
11 DATE ON THIS, MR. KALTGRAD?

12 A YOU WON'T FIND ONE.

13 Q I WON'T FIND ONE?

14 A JUST BECAUSE IT'S NOT THERE.

15 Q OKAY. DO YOU KNOW ABOUT WHEN IN YOUR
16 TREATMENT...

17 A LOOKS LIKE THIS WOULD BE JULY OR AUGUST 2017.

18 Q OKAY. BUT IT'S DEFINITELY AFTER SHE LEFT FILMON?

19 A OH, YES.

20 Q OKAY. SO NOW SHE BELIEVES SHE HAS AN ENEMY
21 PLOTTING AGAINST HER WHO USED TO BE A FRIEND; CORRECT?

22 A NO, THAT'S A MISCHARACTERIZATION.

23 Q OKAY. WELL, LET'S READ IT.

24 "IS SHE STILL PLOTTING AGAINST ME?"

25 YOU'RE TALKING ABOUT -- YOU'RE NOT TALKING ABOUT YOU,
26 THIS IS SOMETHING MS. REEVES SAID TO YOU; CORRECT?

27 A CORRECT.

28 Q OKAY. AND SHE SAYS, "HAVING AN ENEMY," SO MS.

1 REEVES IS TELLING YOU THAT SHE HAS AN ENEMY?

2 A RIGHT. THIS WOULD BE SHALAR.

3 Q WHO USED TO BE A FRIEND?

4 A RIGHT.

5 Q AND IS WONDERING IF SHE'S PLOTTING AGAINST ME;
6 CORRECT?

7 A CORRECT.

8 Q OKAY. AND THIS WAS SOMEBODY WHO USED TO BE A
9 FRIEND; CORRECT?

10 A WHO SHE THOUGHT WAS A FRIEND.

11 Q OKAY. AND --

12 A IT WOULD BE ANOTHER ONE OF THOSE CASES WHERE HER
13 ALARMS DID NOT GO OFF IS MY OPINION.

14 Q ANOTHER CASE WHERE SOMEBODY WAS PLOTTING AGAINST
15 HER AND SHE DIDN'T NOTICE IT UNTIL SOMETIME LATER, IS
16 THAT IT?

17 A YES. THIS WAS THE WOMAN WHO HAD BEEN DOING THE
18 TWITTER CAMPAIGN ANONYMOUSLY AGAINST HER.

19 Q OKAY. ALL RIGHT. SO THAT WAS -- SHALAR WAS THE
20 NAME?

21 A INDEED.

22 Q ALL RIGHT. NOW, LET'S GO TO PAGE 32.

23 MR. GOLDBERG: ARE YOU ALL RIGHT, JUDGE?

24 HON. T.A. GREEN: I'M FINE, THANK YOU.

25 THE WITNESS: 32?

26 MS. GAROFALO: YEP.

27 Q AND AT THE TOP, IT SAYS, "THIS GIRL, ARROW SARA
28 B, FEELS LIKE T.J. WISHES HER ILL"?

1 A UM-HMM.

2 Q "TRYING TO BLOCK HER"?

3 A UM-HMM.

4 Q WHAT WAS THAT ALL ABOUT?

5 A YOU ASKED ME THE OTHER DAY, I STILL DON'T KNOW.

6 Q OKAY. BUT THIS IS SOMEBODY ELSE WHO MS. REEVES
7 WAS FEELING WAS SOMEHOW WORKING AGAINST HER; CORRECT?

8 A I WOULD SAY BLOCKS ADDRESSES PROFESSIONAL, BUT I
9 DON'T RECALL.

10 Q YOU DON'T RECALL WHAT THAT ONE IS?

11 A UM-HMM.

12 Q AND MS. REEVES ALSO COMPLAINED TO YOU ABOUT
13 SOMEONE AT WORK WHO WAS PLOTTING AGAINST HER; ISN'T THAT
14 CORRECT?

15 A I DON'T RECALL THAT.

16 Q YOU DON'T RECALL THAT?

17 A CAN YOU REMIND ME WHO THAT IS?

18 Q I WILL.

19 A THANK YOU.

20 Q LET'S LOOK AT PAGE 21. AND THIS HAS TWO DATES ON
21 IT, ONE IS 6/9/17, AND THE OTHER IS 6/7/17, AND IT SAYS,
22 "WORK SLASH," WHOOPS, YOU'VE GOT THE WRONG. THERE WE
23 GO, "WORK SLASH OFFICE MATE IS ATTACKING HER"?

24 A RIGHT. NOTHING ABOUT PLOTTING.

25 Q OH?

26 A NOTHING ABOUT PLOTTING.

27 Q OH, I STAND CORRECTED.

28 THIS TIME, THE -- WHERE THE OFFICE MATE IS

1 ATTACKING HER IN JUNE OF 2017?

2 A AND IT MEANS ATTACKING HER IDEAS, TO BE CLEAR,
3 THERE WAS NO SUGGESTION OF ANY PHYSICAL VIOLENCE THERE.
4 SHE FELT THAT SHE WAS BEING -- HER IDEAS WERE BEING TORN
5 DOWN.

6 Q ALL RIGHT. SO IN JUNE OF 2017 --

7 A UM-HMM.

8 Q -- MS. REEVES IS TELLING YOU ABOUT ISSUES EITHER
9 BEING THREATENED, ATTACKED OR PLOTTED AGAINST BY MR.
10 DAVID AND AT LEAST THREE OTHER PEOPLE; CORRECT?

11 A NO, I COULD NOT PUT THOSE TOGETHER.

12 Q LET'S GO BACK TO MS. REEVES' PRESENT CONDITION
13 AND LET'S FIRST LOOK AT A DOCUMENT THAT I HAVE
14 MISPLACED. HOLD ON ONE SEC. I'LL FIND THAT IN A
15 MINUTE.

16 Q SO, NOW, YOU'VE TOLD US THAT -- YOU HAVE STATED
17 THAT MS. REEVES IS SIGNIFICANTLY IMPROVED; IS THAT
18 CORRECT?

19 A CORRECT.

20 Q AND WHICH SYMPTOMS ARE SIGNIFICANTLY IMPROVED?

21 A SHE'S SLEEPING BETTER, SHE -- I THINK SHE'S STILL
22 VIGILANT, BUT LESS VIGILANT. HER CONCENTRATION HAS
23 IMPROVED, SHE IS ABLE TO GET PLEASURE FROM SOME THINGS,
24 NOT AS MUCH AS SHE USED TO, BUT SHE'S ABLE TO GET
25 PLEASURE FROM SOME THINGS. SHE'S MORE SOCIAL, SHE HAS
26 MORE ENERGY, SHE'S ABLE -- SHE DOESN'T HAVE AS MANY
27 NIGHTMARES AS SHE WAS HAVING. IF I COULD LOOK AT THE
28 SYMPTOMS, I COULD PROBABLY DO A BETTER JOB OF -- MAY I

1 LOOK AT MY SYMPTOM LIST?

2 Q SURE.

3 A OKAY. THIS IS THE DSM SYMPTOMS THAT I HAD THE
4 OTHER DAY, IT'S JUST HARD TO REMEMBER THEM ALL.

5 SO FEWER NIGHTMARES, LESS DISTRESS, SHE CAN DRIVE
6 THROUGH BEVERLY HILLS NOW, I BELIEVE. SHE WAS UNABLE TO
7 FOR A COUPLE YEARS.

8 SHE -- SO SHE'S AVOIDING -- SHE'S NOT ENGAGING IN
9 AS MUCH AVOIDANCE BEHAVIOR, SHE DOESN'T GET TRIGGERED AS
10 EASILY, SHE IS NOT FILLED WITH NEARLY AS MUCH FEAR AND
11 HORROR AS SHE WAS.

12 I'M REPEATING MYSELF, I'M SORRY, BUT I'M GOING
13 THROUGH THIS LIST HERE SYSTEMATICALLY NOW.
14 I THINK SHE FEELS LESS DETACHED FROM OTHERS. I THINK,
15 YEAH, AND SHE HAS A BETTER -- SHE'S BETTER ABLE TO ENJOY
16 THINGS. LESS IRRITABLE, LESS HYPERVIGILANT. I DON'T
17 KNOW ABOUT THE STARTLED RESPONSE. AND THE SLEEP IS
18 BETTER, SO THOSE ARE THE PTSD SYMPTOMS.

19 IN TERMS OF MAJOR DEPRESSION, I DON'T THINK --
20 SHE'S NOT AS DEPRESSED AS SHE WAS. AGAIN, SHE'S ABLE TO
21 HAVE INTEREST IN THINGS MORE THAN SHE WAS, SHE STILL HAS
22 THE WEIGHT GAIN. SLEEP IS BETTER, NOT AS GOOD AS IT
23 WAS. ENERGY IS BETTER, CONCENTRATION IS BETTER, AND I
24 DON'T BELIEVE SHE THINKS OF DYING NOW.

25 Q NOW, I JUST WANT TO BE CERTAIN WE UNDERSTAND YOU
26 CORRECTLY.

27 WHEN YOU SAY "MORE THAN SHE WAS," DO YOU MEAN
28 MORE THAN SHE WAS WHEN SHE BEGAN TREATMENT WITH YOU OR

1 MORE THAN SHE WAS BEFORE SHE WORKED AT FILMON?

2 A YOU'LL HAVE TO REMIND ME WHAT I SAID MORE THAN
3 SHE WAS ABOUT.

4 Q YOU SAID IT SEVERAL TIMES, SHE COULD ENJOY THINGS
5 MORE THAN SHE WAS.

6 A OH, MORE THAN SHE WAS WHEN SHE FIRST CAME TO SEE
7 ME, SO I WAS JUST DOING A COMPARISON FROM WHEN I FIRST
8 SAW HER.

9 Q OKAY. BECAUSE YOU CAN'T COMPARE MS. REEVES
10 EITHER WHEN SHE FIRST SAW YOU OR NOW TO WHAT MS. REEVES
11 WAS BEFORE SHE WORKED AT FILMON BECAUSE YOU HAD NEVER
12 MET MS. REEVES; CORRECT?

13 A I CAN ONLY COM -- MAKE COMPARISONS BASED ON HER
14 SELF REPORT, WHICH IS WHAT I'M ALWAYS RELYING ON, BUT IT
15 IS DIFFERENT WHEN I'M ACTUALLY SEEING THE PERSON AND
16 TALKING TO THEM, FOR SURE.

17 Q THE QUESTION IS, DR. MEYER, THAT PRIOR TO
18 DECEMBER 2016, YOU HAD NEVER MET MS. REEVES; CORRECT?

19 A THAT'S CORRECT. STILL CORRECT.

20 Q YOU DIDN'T KNOW WHAT SHE LOOKED LIKE; CORRECT?

21 A ABSOLUTELY.

22 Q DIDN'T KNOW HOW THIN OR FAT SHE WAS; CORRECT?

23 A WELL, I KNEW SHE'D WORKED AS A MODEL, SO I KNEW
24 SHE HAD TO HAVE BEEN PRETTY THIN. WELL, ACTUALLY, I WAS
25 TOLD SHE WAS -- WORKED AS A MODEL.

26 Q THAT'S MY POINT.

27 ANYTHING THAT YOU THOUGHT SHE WAS PRIOR TO
28 DECEMBER 2016 --

1 A UM-HMM.

2 Q -- IS BASED SOLELY ON WHAT MS. REEVES TOLD YOU;
3 CORRECT?

4 A CORRECT.

5 Q MS. REEVES HIRED YOU AND TOLD YOU THOSE THINGS
6 ONLY AFTER SHE FILED HER LAWSUIT AGAINST MR. DAVID;
7 CORRECT?

8 A CORRECT. WELL, SHE DIDN'T HIRE ME. BUT CORRECT,
9 I -- SHE STARTED SEEING ME.

10 Q FAIR ENOUGH.

11 SO EVERYTHING SHE TOLD YOU ABOUT WHAT SHE WAS
12 PRIOR TO --

13 A UM-HMM.

14 Q -- TO DECEMBER OF 2016, WAS TOLD TO YOU AFTER SHE
15 FILED THIS LAWSUIT AGAINST MR. DAVID; RIGHT?

16 A WRONG.

17 Q OKAY. LET ME REPHRASE IT BECAUSE ANYTHING THAT
18 YOU UNDERSTOOD MS. REEVES WAS PRIOR TO 2015 OR PRIOR TO
19 DECEMBER 2016, WAS BASED ON WHAT SHE TOLD YOU?

20 A CORRECT.

21 Q AND WHAT SHE TOLD YOU SHE TOLD YOU AFTER SHE
22 FILED THIS LAWSUIT; CORRECT?

23 A SOME OF IT SHE TOLD ME BEFORE SHE FILED THIS.
24 WE'VE LEARNED -- I MADE A MISTAKE THE OTHER DAY. SHE
25 HADN'T YET FILED THE LAWSUIT WHEN I MET HER. SHE HAD
26 MET WITH HER ATTORNEYS, BUT HAD NOT FILED THE LAWSUIT.

27 Q FAIR ENOUGH.

28 EVERYTHING SHE TOLD YOU ABOUT WHAT SHE WAS --

1 A UM-HMM.

2 Q -- WAS TOLD TO YOU AFTER SHE HIRED COUNSEL TO
3 BRING THIS LAWSUIT; CORRECT?

4 A CORRECT.

5 Q AND YOU, IN FACT, WERE RECOMMENDED BY THE
6 LAWYERS; CORRECT?

7 A CORRECT.

8 Q AND YOU KNEW FROM THE FIRST DAY YOU SAW MS.
9 REEVES THAT THE NOTES YOU WERE TAKING AND YOUR TREATMENT
10 OF MS. REEVES WOULD SOMEDAY -- MIGHT SOMEDAY BE THE
11 SUBJECT OF YOUR TESTIMONY IN THIS LAWSUIT; CORRECT?

12 A THAT WAS NOT MY ASSUMPTION. IT SHOULD HAVE BEEN,
13 BUT AS I SAID, I'VE NEVER HAD A CASE GO TO TRIAL BEFORE,
14 SO I DIDN'T OPERATE WITH THE IDEA THAT THIS WAS GOING TO
15 GO TO TRIAL.

16 Q OKAY. YOU UNDERSTOOD THAT IF THIS CASE WENT TO
17 TRIAL, THAT YOUR NOTES AND YOUR TESTIMONY -- I -- STRIKE
18 THAT.

19 YOU WOULD BE PROVIDING TESTIMONY ON THE NOTES YOU
20 WERE TAKING OF YOUR SESSIONS WITH MS. REEVES; CORRECT?

21 A I WAS NOT FOCUSED ON THAT.

22 Q AND DID THAT IN ANY WAY AFFECT WHAT YOU DECIDED
23 TO WRITE DOWN AND WHAT YOU DECIDED TO KEEP OUT OF YOUR
24 NOTES?

25 A UNFORTUNATELY NOT. AS I'VE SAID, I WOULDN'T HAVE
26 WRITTEN DOWN A LOT OF THE THINGS ABOUT HER FAMILY IF I
27 HAD BEEN THINKING ABOUT THAT.

28 Q AND BY THE WAY, LET ME JUST GO BACK FOR A MOMENT.

1 ARE YOU TESTIFYING THAT YOU FIRST SAW MS. REEVES BEFORE
2 THIS LAWSUIT WAS FILED?

3 A APPARENTLY, I -- REMEMBER, I GOT THAT WRONG TWICE
4 AND THEN I WAS CORRECTED, SO I DON'T KNOW WHEN THE
5 LAWSUIT WAS FILED.

6 Q OKAY.

7 A I KNOW WHEN SHE WENT TO THE LAWYERS AND I KNOW
8 THE LAWYERS REFERRED HER TO ME, BUT I DON'T REALLY KNOW
9 WHEN THE LAWSUIT WAS FILED.

10 Q AND YOUR FIRST VISIT WITH MS. REEVES WAS
11 DECEMBER 20TH, 2016; CORRECT?

12 A DECEMBER SOMETHING.

13 Q ALL RIGHT. THE DATE OF THE FIRST NOTE, AS YOU
14 CAN SEE HERE?

15 A YES.

16 Q OKAY. AND WHEN YOU TOLD MS. REEVES AT THE
17 BEGINNING THAT CERTAIN THINGS -- IF SHE TOLD YOU CERTAIN
18 THINGS, IT INDICATED SHE WAS A THREAT TO HERSELF OR
19 OTHERS --

20 A UM-HMM.

21 Q -- YOUR NOTES, YOUR THERAPY SESSIONS, MIGHT NOT
22 BE CONFIDENTIAL; CORRECT?

23 A NO. WELL, IT HAS NOTHING TO DO WITH NOTES,
24 THAT'S JUST TO KEEP HER SAFE, SO I MIGHT NOT NEED TO
25 NOTIFY A FAMILY MEMBER WHO MIGHT NOTIFY LAWYERS IF
26 THAT'S WHO I KNEW, I MIGHT CALL 911, I WOULD JUST HAVE
27 TO DO SOMETHING TO KEEP HER SAFE. THAT HAS NOTHING TO
28 DO WITH MY NOTES.

1 Q ALL RIGHT. WHAT EXACTLY DID YOU TELL HER WITH
2 RESPECT TO CONFIDENTIAL ON DECEMBER 20TH, 2016, DURING
3 YOUR FIRST SESSION?

4 MR. GOLDBERG: I THINK YOU MISSTATED, COUNSEL.
5 IT WAS DECEMBER 10TH, I BELIEVE.

6 THE WITNESS: AND I CAN'T TELL YOU EXACTLY WHAT I
7 TOLD HER BECAUSE IT WAS THREE YEARS AGO, BUT GENERALLY,
8 WHAT I TELL PEOPLE IS, WHAT YOU SAY HERE IS PRIVATE
9 UNLESS IT'S A DANGER TO YOURSELF OR DANGER TO OTHERS.
10 I'M SURE I ALSO TOLD HER BECAUSE THIS IS IN A LAWSUIT,
11 THIS IS A DIFFERENT SITUATION AND THINGS MAY NOT STAY --
12 STAY PRIVATE. I AM SURE I TOLD HER THAT.

13 MS. GAROFALO:

14 Q OKAY.

15 A BUT I TELL EVERYONE THAT. AND AGAIN, NEVER HAVE
16 I HAD TO TESTIFY, SO...

17 Q OKAY. SO YOU TOLD HER THAT BECAUSE THIS WAS A
18 LAWSUIT --

19 A UM-HMM.

20 Q -- NOTHING THAT SHE TOLD YOU WOULD NECESSARILY BE
21 CONFIDENTIAL; CORRECT?

22 A YES, I WOULD PRESUME.

23 Q BECAUSE SOMEDAY YOU MIGHT HAVE TO TESTIFY TO IT;
24 CORRECT?

25 A UM-HMM.

26 Q SO IT WAS NO DIFFERENT THAN SUICIDAL THOUGHTS
27 BECAUSE NOTHING SHE TOLD YOU WAS ANTICIPATED TO BE
28 CONFIDENTIAL; CORRECT?

1 A NO, THAT'S VERY DIFFERENT. SO IF IT'S SUICIDAL,
2 I HAVE TO DO SOMETHING TO KEEP HER SAFE, THAT HAS
3 NOTHING TO DO WITH DISCLOSING ANYTHING PERSONAL ABOUT
4 HER, THOSE ARE DIFFERENT THINGS.
5 I THINK YOU'RE A LITTLE CONFUSED ON THAT.

6 Q SO DO YOU THINK SHE -- I'M A LITTLE CONFUSED?

7 A ON THAT.

8 Q SO DID SHE -- SO WHY DO YOU THINK SHE DIDN'T TELL
9 YOU ABOUT BEING SUICIDAL? SHE DIDN'T WANT HELP?

10 A I -- I DON'T KNOW, I'VE TOLD YOU MY SPECULATION,
11 BUT I DON'T KNOW.

12 Q BUT YOUR SPECULATION WAS WRONG, WASN'T IT?

13 A I DON'T KNOW WHAT YOU MEAN.

14 Q SHE DIDN'T NOT TELL YOU ABOUT BEING SUICIDAL?

15 A WAIT, THAT'S A DOUBLE NEGATIVE.

16 Q FOR FEAR THAT IT WOULD NOT BE CONFIDENTIAL; ISN'T
17 THAT RIGHT?

18 A I DON'T KNOW.

19 Q BY THE WAY -- SO MS. REEVES TOLD YOU ABOUT A
20 NUMBER OF INCIDENTS WITH MR. DAVID; IS THAT CORRECT?

21 A YES.

22 Q OKAY. AND WHAT WERE THE INCIDENTS? I'M NOT
23 TALKING ABOUT IN THE TESTIMONY.

24 A UM-HMM.

25 Q WHAT WERE THE INCIDENTS THAT MS. REEVES TOLD YOU
26 ABOUT DURING THE COURSE OF HER THERAPY WITH YOU?

27 A THE FINAL INCIDENT WHEN HE PUT HER HEAD FORCIBLY
28 ON HIS CROTCH IN THE LOCKED OFFICE. SHE TOLD ME ABOUT

1 THE PUSHING HER UP AGAINST A WALL AND CHOKING, HOLDING
2 HER THROAT. SHE TOLD ME ABOUT THE MAN-GINA. SHE TOLD
3 ME ABOUT GETTING -- WELL, THAT'S WHAT -- THAT'S WHAT I
4 CAN REMEMBER.

5 Q OKAY. SO THE FINAL INCIDENT, YOU JUST SAID SHE
6 TOLD YOU ABOUT THE FINAL INCIDENT IN A LOCKED -- IN MR.
7 DAVID'S LOCKED OFFICE?

8 A I DON'T THINK I SAID LOCKED.

9 Q WELL, YOU DID BECAUSE I WROTE IT DOWN.

10 A WELL, I WRITE DOWN THINGS THAT ARE WRONG ALL THE
11 TIME. BUT MAYBE I DID. BUT I DIDN'T MEAN LOCKED,
12 CLOSED OFFICE.

13 Q THAT THE OFFICE DOOR WAS CLOSED, THAT'S WHAT SHE
14 TOLD YOU?

15 A BEING ALONE WITH HIM.

16 Q SO IF MS. REEVES AT THIS POINT HAS SUFFERED
17 INCIDENTS INCLUDING -- ACCORDING TO WHAT SHE TOLD YOU, A
18 CHOKING INCIDENT --

19 A UM-HMM.

20 Q -- AND SHE WAS -- WELL, STRIKE THAT.

21 DID MS. REEVES TELL YOU WHY SHE FEARLESS --
22 FEARLESSLY WALKED INTO MR. DAVID'S OFFICE ALONE?

23 A WE DIDN'T --

24 Q AND HAD THE DOOR -- WITH THE DOOR CLOSED?

25 A WE DIDN'T DISCUSS THAT.

26 Q YOU DIDN'T DISCUSS THAT.

27 OKAY. AND DID SHE TELL YOU THAT MR. DAVID PUSHED
28 HER AGAINST THE WALL AND SHE HIT HER HEAD?

1 A SHE HAD TOLD ME ABOUT THAT.

2 Q AND YOU HAVEN'T READ ANY OF THE TESTIMONY IN THIS
3 CASE THAT CONTRADICTS MS. REEVES' DEPICTION OF THAT
4 INCIDENT?

5 A NO, I HAVE NOT.

6 Q AND OTHER THAN THOSE THREE THINGS THAT YOU'VE
7 JUST TOLD US, ANYTHING ELSE THAT YOU CAN RECALL THAT
8 CAUSED MS. REEVES -- THAT MS. REEVES TOLD YOU CAUSED HER
9 TO BE IN THE STATE SHE WAS IN WHEN SHE BEGAN SEEING YOU
10 IN DECEMBER 2016?

11 A YES, IT WAS HER SENSE THAT HE WAS CRUEL, TRYING
12 TO DOMINATE, HUMILIATE HER, THAT HE ENJOYED OTHER
13 PEOPLE'S PAIN, THAT HE ENJOYED SHOCKING PEOPLE, THAT HE
14 ENJOYED WHEN PEOPLE SUFFERED, THAT HE HAD BRAGGED ABOUT
15 SOMEONE WHO HAD KILLED THEMSELF ON HIS SHOW, THAT HE HAD
16 TAKEN PLEASURE FROM SOMEBODY PUTTING HOT SAUCE IN THEIR
17 EYES, SOMEBODY PUTTING A NAIL THROUGH THEIR TESTICLES.

18 SHE HAD DESCRIBED A MAN WHO SOUNDED QUITE
19 TERRIFYING.

20 Q YOU DID UNDERSTAND, DIDN'T YOU, THAT THAT WAS ALL
21 PART OF THE EQUIVALENT OF A TELEVISION SHOW,
22 ENTERTAINMENT?

23 A YES, AND I --

24 Q WRITTEN, WRITTEN ENTERTAINMENT?

25 A SORRY. I DID UNDERSTAND THAT IT WAS
26 ENTERTAINMENT, BUT THE NATURE OF THE ENTERTAINMENT TOLD
27 ME ABOUT -- A LOT ABOUT THE PERSON WHO WAS PRODUCING IT.

28 Q ALL RIGHT. WELL, WE'RE NOT ASKING YOU TO ANALYZE

1 MR. DAVID.

2 A WELL, YOU ASKED ME --

3 Q I -- I'M ASKING YOU A QUESTION.

4 YOU UNDERSTOOD THAT MS. REEVES HAD SIGNED ON TO WORK ON
5 THIS KIND OF MATERIAL, DIDN'T YOU?

6 MR. GOLDBERG: OBJECTION. ASSUMES FACTS NOT IN
7 EVIDENCE.

8 HON. T.A. GREEN: OVERRULED.

9 MR. GOLDBERG: YOUR HONOR --

10 HON. T.A. GREEN: YOU MAY ANSWER.

11 THE WITNESS: MY UNDERSTANDING HAD BEEN THAT SHE
12 WAS WORKING ON A DIFFERENT SUBSET OF HIS COMPANY THAT
13 WAS NOT DOING THAT KIND OF STUFF, THAT SHE FOUND THAT
14 STUFF ABHORRENT AND DISGUSTING. AND THAT SHE HAD BEEN
15 QUITE CLEAR THAT SHE WOULDN'T WORK ON THAT AS MUCH AS
16 SHE NEEDED A JOB, BUT THAT SHE WOULD WORK ON SOMETHING
17 ELSE IN THE COMPANY.

18 MS. GAROFALO:

19 Q AND --

20 A BUT THAT HAD NOTHING TO DO WITH WHO THE MAN IS
21 WHO WOULD THEN LATER ASSAULT HER.

22 Q OKAY. I'M TALKING ABOUT MS. REEVES.

23 THAT'S WHAT MS. REEVES TOLD YOU, THAT SHE HAD NOTHING
24 ELSE TO DO WITH ANY OF THIS OTHER CONTENT, THAT SHE WAS
25 JUST COMPLETELY UNINVOLVED, THAT'S WHAT YOU'RE SAYING?

26 A THAT WAS MY IMPRESSION WAS THAT SHE DIDN'T WANT
27 TO WORK ON THAT STUFF, YEAH.

28 Q OKAY. DID SHE TELL YOU THAT?

1 A I -- I DON'T RECALL.

2 Q OKAY. SO IT WAS YOUR IMPRESSION THAT SHE JUST
3 DIDN'T WANT TO DO IT BECAUSE YOUR IMPRESSION WAS THAT
4 MS. REEVES WAS JUST TOO NICE A PERSON TO WORK ON THAT
5 KIND OF CONTENT?

6 A NO, I DIDN'T SAY THAT.

7 Q LET'S GO BACK TO MS. REEVES' IMPROVEMENT.
8 AND LET'S GO BACK TO EXHIBIT 104, PAGE 2, MR. KALTGRAD,
9 IF WE MIGHT. A LITTLE BIT BIGGER FOR THOSE OF US WHO
10 CAN'T SEE. THANK YOU.

11 AND DO YOU RECOGNIZE THIS DOCUMENT, THIS PAGE?

12 A YES.

13 Q AND WHAT IS THIS?

14 A THIS WAS MY BILLING RECORD AND RECORD OF SESSIONS
15 THAT WE'D HAD.

16 Q OKAY.

17 A UP UNTIL THE END OF 2000. WELL, UP UNTIL AUGUST
18 OF 2018.

19 Q OKAY. AND IT HAS A DATE ON IT OF SEPTEMBER 5TH,
20 2018.

21 IS THAT AT OR ABOUT THE TIME YOU PREPARED THIS?

22 A YES.

23 Q AND WAS THIS PREPARED AT THE REQUEST OF MS.
24 REEVES' COUNSEL?

25 A YES.

26 Q AND IT WAS PREPARED AT THE TIME THAT YOU GAVE
27 YOUR NOTES TO MS. REEVES' COUNSEL?

28 A I BELIEVE SO.

1 Q AND WE HAVE AT THE TOP, 2016, ONE SESSION.
2 THAT WAS THE DECEMBER 20TH SESSION; CORRECT?

3 A UM-HMM. CORRECT.

4 Q AND UNDERNEATH IT, WE HAVE 2017 AND I BELIEVE IT
5 SAYS 41 SESSIONS; CORRECT?

6 A CORRECT. IT SAYS 41 ABOVE AND 42 BELOW, BUT
7 BASICALLY THERE.

8 Q MY MATH ISN'T THAT GOOD.
9 BUT THAT'S LESS THAN ONCE A WEEK ON AVERAGE?

10 A IT WAS ABOUT ONCE A WEEK.

11 Q AND THEN WE HAVE 2018.
12 CAN YOU JUST GO UP A LITTLE BIT. THERE WE GO.

13 AND YOU HAVE 27 SESSIONS?

14 A CORRECT.

15 Q AND THE NUMBER OF SESSIONS HAS DROPPED
16 SIGNIFICANTLY FROM 2017 TO 2018; CORRECT?

17 A CORRECT.

18 Q AND I THINK YOU TOLD US -- WE DON'T HAVE TO LOOK
19 AT THE NEXT PAGE UNLESS YOU CAN'T RECALL -- THAT SHE HAD
20 ABOUT FIVE SESSIONS IN 2019; CORRECT?

21 A CORRECT.

22 Q WHICH WOULD BE LESS THAN ONCE A MONTH, MAYBE ONCE
23 EVERY OTHER MONTH; CORRECT?

24 A CORRECT.

25 Q AND THE REDUCTION IN THE NUMBER OF SESSIONS, DOES
26 THAT INDICATE THAT MS. REEVES NEEDED LESS THERAPY AS WE
27 MOVE FROM 2017 THROUGH 2019?

28 A WELL, IT INDICATED THAT SHE CHOSE TO HAVE LESS

1 THERAPY.

2 Q AND IT IS CONSISTENT WITH WHAT YOU'VE TOLD US
3 THAT SHE HAD SIGNIFICANTLY IMPROVED; ISN'T THAT TRUE?

4 A SHE HAD IMPROVED. SHE WAS ALSO WORKING, SO SHE
5 WASN'T AT LIBERTY TO COME AS EASILY.

6 Q AND THAT -- THE FACT THAT MS. REEVES WAS
7 WORKING --

8 A UM-HMM.

9 Q -- I DON'T KNOW IF IT WAS A FULL-TIME JOB, BUT ON
10 A SHOW THAT'S ON STEADILY FOR MORE THAN ONE SEASON --

11 A UM-HMM.

12 Q -- DOES THAT INDICATE TO YOU THAT HER CONDITION
13 AND THE CONDITIONS YOU WERE TREATING HAD IMPROVED?

14 A YES, I THINK THEY HAD IMPROVED.

15 Q OKAY.

16 MS. GAROFALO: I HAVE NO FURTHER QUESTIONS.

17 HON. T.A. GREEN: THANK YOU. WE HAVE LIKE FIVE
18 MINUTES. HOW FAST CAN YOU TALK?

19 THE WITNESS: WE'RE BOTH FROM NEW YORK.

20 MR. GOLDBERG: WELL, I'M NOT GOING TO FINISH IN
21 FIVE MINUTES, YOUR HONOR.

22 HON. T.A. GREEN: OKAY. WELL, DO YOU WANT TO
23 START?

24 MR. GOLDBERG: I COULD START. OKAY. ALL RIGHT.

25

26 REDIRECT EXAMINATION

27 MR. GOLDBERG:

28 Q DR. MEYER, FIRST OF ALL, DID ANY OF YOUR

1 TREATMENT -- WERE YOU TAKING INTO ACCOUNT HOW THINGS
2 WOULD LOOK IN A LAWSUIT?

3 A NO.

4 Q OKAY. AND IF SOMEBODY WAS TRYING TO BUILD A
5 CASE, DO YOU THINK THEY WOULD COME IN AND TELL YOU ABOUT
6 T.J. AND ABOUT OTHER EXPERIENCES THAT THEY HAD?

7 MS. GAROFALO: OBJECTION, OBJECTION.

8 HON. T.A. GREEN: SUSTAINED.

9 MR. GOLDBERG: WELL, COUNSEL, YOUR HONOR, SHE
10 BROUGHT IT UP.

11 HON. T.A. GREEN: BUT SHE MAY HAVE ASKED ABOUT
12 THAT TOPIC, BUT THAT ASSUMES THE DOCTOR UNDERSTANDS THE
13 INS AND OUTS OF CIVIL LITIGATION AND TRIAL TACTICS,
14 WHICH YOU COULD LAY A FOUNDATION, IF YOU WANT.

15 MR. GOLDBERG: ALL RIGHT.

16 Q IS THERE ANYTHING ABOUT THE WAY SHE COMMUNICATED
17 TO YOU THAT WOULD SUGGEST THAT SHE WAS TRYING TO BUILD A
18 CASE?

19 A NO.

20 Q IF SOMEBODY COMES TO YOU TO BUILD A CASE, DOES IT
21 -- GENERALLY, DO THEY GET BETTER, DO THEY TRY TO GET
22 BETTER, DO THEY TRY TO BUILD A CASE?

23 MS. GAROFALO: OBJECTION, YOUR HONOR.

24 HON. T.A. GREEN: SUSTAINED AS PHRASED.

25 MR. GOLDBERG:

26 Q WELL, SHE CAME TO YOU FOR HELP; RIGHT?

27 A YES.

28 Q AND YOU GAVE HER THERAPY FOR TWO YEARS; CORRECT?

1 A ABOUT.

2 Q IN YOUR PROFESSIONAL OPINION, IF SHE HADN'T
3 GOTTEN THE HELP THAT YOU GAVE HER, WHAT WOULD HAVE
4 HAPPENED TO HER?

5 A I DON'T -- THE FIRST THOUGHT IN MY MIND IS SHE
6 MIGHT HAVE GONE OFF THE BRIDGE, BUT I DON'T KNOW.

7 Q OKAY. NOW --

8 A YOU'D HAVE TO ASK HER THAT.

9 Q WELL, YOU HAVE -- YOU SAW HER THAT FIRST TIME ON
10 DECEMBER 20TH --

11 A YES.

12 Q -- OF 2016; RIGHT?

13 A YES.

14 Q YOU SAW THE CONDITION SHE WAS IN?

15 A AND I SAW HER IN THAT SIMILAR CONDITION MANY
16 OTHER DAYS.

17 Q AND THAT CONDITION THAT YOU SAW, YOU'VE INDICATED
18 THAT SHE HAD PTSD?

19 A THE FIRST SESSION I WOULDN'T HAVE CONCLUDED THAT.
20 BUT YES.

21 Q RIGHT.

22 BUT YOU DID CONCLUDE THAT; RIGHT?

23 A YES. SOON AFTER, I DID.

24 Q NOW, I JUST WANT TO GO OVER A FEW THINGS.

25 NOW, COUNSEL BROUGHT UP THAT THERE WERE SOME
26 INCIDENTS THAT HAPPENED WHEN SHE WAS A YOUNG CHILD THAT
27 MANY PEOPLE WOULD DESCRIBE DIFFERENT WAYS, BUT THEY WERE
28 PRETTY HARSH PUNISHMENTS YOU'VE SAID; CORRECT?

1 A CORRECT.

2 Q AND NOTWITHSTANDING THESE HARSH PUNISHMENTS, HOW
3 DID THINGS EVOLVE FOR HER AS AN ADULT?

4 MS. GAROFALO: OBJECTION, YOUR HONOR, I -- THAT
5 LACKS FOUNDATION.

6 HON. T.A. GREEN: THAT'S ALSO PRETTY VAGUE. I
7 DON'T KNOW IF YOU CAN ANSWER THAT QUESTION.

8 MR. GOLDBERG: WELL, THE QUESTIONS ARE VAGUE.

9 Q WHEN SHE WAS 18 YEARS OLD, WHAT DID SHE DO?

10 A SHE BECAME A REPORTER IN ALASKA WITHOUT HER
11 FAMILY'S SUPPORT.

12 Q WHEN SHE WAS 19 YEARS OLD, WHAT WAS SHE DOING?

13 A I THINK SHE MOVED UP AS A REPORTER TO SOME HIGHER
14 LEVEL, BUT I DON'T KNOW THE SPECIFICS OFF HAND.

15 Q AND BEFORE HER 21ST BIRTHDAY, WHAT WAS SHE DOING?

16 A SHE HAD MOVED TO NEW YORK HOPING TO MAKE IT INTO
17 THE ENTERTAINMENT BUSINESS, AGAIN, WITHOUT HER FAMILY'S
18 SUPPORT.

19 Q AND FOR THE NEXT TEN YEARS, SHE WAS IN NEW YORK
20 SUPPORTING HERSELF; CORRECT?

21 A SHE WAS.

22 MS. GAROFALO: OBJECTION. LACKS FOUNDATION.
23 SUPPORTING...

24 MR. GOLDBERG:

25 Q BASED ON WHAT SHE TOLD YOU.

26 HON. T.A. GREEN: YEAH, WAIT, WAIT, WAIT.

27 CAN YOU ANSWER THAT QUESTION OR DO YOU KNOW THE
28 ANSWER?

1 THE WITNESS: I MEAN, AS MUCH AS I KNOW ANYTHING,
2 I KNOW THE ANSWER. I MEAN, ANYTHING ABOUT THAT.

3 HON. T.A. GREEN: I GOT THAT.

4 MR. GOLDBERG:

5 Q WHAT DID SHE DO FOR THE NEXT TWO YEARS?

6 A I'M SORRY, I GOT DISTRACTED.

7 Q WHAT DID SHE DO IN NEW YORK? WAS SHE WORKING?

8 A SHE WAS WORKING AT LOTS OF DIFFERENT JOBS. SHE
9 WAS VERY RESOURCEFUL. SHE MET LOTS OF PEOPLE. SHE
10 ENDED UP AS JIMMY FALLON'S SIDEKICK. SHE WAS A MODEL.

11 MS. GAROFALO: OBJECTION, YOUR HONOR.

12 HON. T.A. GREEN: SUSTAINED.

13 MR. GOLDBERG:

14 Q NOW, DOES THE HISTORY OF HER EMPLOYMENT, HOW DOES
15 THAT FACTOR INTO WHAT YOU THINK ABOUT THESE EARLIER
16 EXPERIENCES SHE HAD WITH HER FATHER?

17 A WELL, IT'S PART OF IT, BUT BECAUSE SHE USED WORK
18 AS A COPING MECHANISM, IT'S NOT THE ONLY THING THAT
19 MAKES ME THINK SHE WAS DOING WELL.

20 Q WHAT ELSE MAKES YOU THINK SHE WAS DOING WELL?

21 A SHE WASN'T ABUSING DRUGS, SHE WASN'T
22 SELF-DESTRUCTIVE, SHE WASN'T CARELESS, SHE WASN'T
23 GETTING IN -- SHE WASN'T DOING DANGEROUS THINGS. SHE
24 WAS PLOTTING A COURSE IN HER LIFE PROFESSIONALLY AND
25 PERSONALLY THAT FROM EVERYTHING I HEARD WAS REALLY
26 IMPRESSIVE.

27 Q NOW, WE'VE HEARD A LOT ABOUT T.J. AND WE -- T.J.
28 -- SHE DATED T.J. FROM WHAT TIME TO WHAT TIME?

1 A I THINK IT WAS 2007 TO 2010.

2 Q AND YOU -- IN YOUR NOTES, THERE'S REFERENCES TO
3 T.J..

4 DO YOU HAVE ANY OPINION AS TO HOW THESE
5 EXPERIENCES WITH T.J., THE ABUSE THAT SHE SUFFERED, THE
6 PHYSICAL VIOLENCE, HOW THEY IMPACTED HER AT THAT TIME?

7 MS. GAROFALO: VAGUE AND AMBIGUOUS AS TO WHAT
8 TIME.

9 MR. GOLDBERG:

10 Q AT THE TIME AND DATE.

11 A CAN YOU BE MORE SPECIFIC?

12 Q YEAH.

13 IN OTHER WORDS, AFTER SHE -- AFTER THEY -- ENDED
14 THE RELATIONSHIP WITH T.J., HOW DID THE EXPERIENCES
15 AFFECT HER?

16 A I THINK SHE BECAME MILDLY DEPRESSED. I DON'T
17 KNOW IF SHE WAS CLINICALLY DEPRESSED, BUT I THINK SHE
18 WAS UNHAPPY AND LOST, SHE HAD GIVEN UP A LOT OF HER
19 CAREER, SHE WAS KIND OF HORRIFIED THAT SHE HAD BEEN WITH
20 HIM. SHE WAS DOWN, IF NOT MILDLY DEPRESSED. I DON'T
21 THINK IT MET CRITERIA FOR FULL DEPRESSION, BUT YOU MIGHT
22 CALL IT DYSPHORIC BLUES FOR, I THINK, A COUPLE OF
23 MONTHS.

24 HON. T.A. GREEN: I'M SORRY, WE HAVE TO HAVE OUR
25 WEEKEND RECESS. I HAVE TO GET TO A MEETING IN PALM
26 SPRINGS OF ALL THINGS. CONDOLENCES HAVE BEEN EXPRESSED
27 BY MANY.

28 ALL RIGHT. LOOK, YOU GUYS ARE REALLY DEDICATED

1 TO THIS CASE. I CAN TELL YOU'RE REALLY INTO IT AND I
2 REALLY APPRECIATE THAT. IT IS AN INTERESTING,
3 CHALLENGING CASE AND I HOPE TO WRAP IT UP, PROBABLY
4 WE'LL ARGUE AND INSTRUCT ON TUESDAY NOW.

5 MS. GAROFALO: WILL YOU BE ORDERING HER TO COME
6 BACK?

7 MR. GOLDBERG: YEAH.

8 HON. T.A. GREEN: BUT WE'RE AHEAD OF SCHEDULE AND
9 THEN THE CASE WILL BE YOURS.

10 OKAY. KEEP IN MIND THE COURT'S ADMONITIONS.

11 DON'T DISCUSS THIS MATTER AMONG YOURSELVES OR
12 WITH ANYONE ELSE. DON'T FORM OR EXPRESS ANY OPINION OR
13 CONCLUSION UNTIL THE MATTER IS GIVEN TO YOU FOR
14 DELIBERATION.

15 ONE ADDITIONAL THING, THERE HAS BEEN SOME PRESS
16 COVERAGE OF THIS CASE. OBVIOUSLY, IF YOU SEE IT OR HEAR
17 ABOUT IT, TUNE IT OUT, DON'T READ IT. OKAY. SEE YOU
18 GUYS 9:30 ON MONDAY. OKAY. 9:30.

19 ON THE RECORD, THE JURY IS NOT PRESENT. COUNSEL
20 IS PRESENT.

21 I THINK THEY ARE GOING TO NEED YOU.

22 THE WITNESS: NO, I MEANT RIGHT NOW. I KNOW,
23 THEY ALREADY GAVE ME THE NEWS.

24 MR. GOLDBERG: YOU'LL COME BACK 9:30 ON MONDAY;
25 RIGHT?

26 THE WITNESS: I'LL COME BACK 9:30 ON MONDAY.

27 HON. T.A. GREEN: OKAY. THANK YOU, DOCTOR,
28 YOU'RE A SPORT.

1 ALL RIGHT. ON THE RECORD, THE JURY IS NOT
2 PRESENT. COUNSEL IS PRESENT.

3 I APOLOGIZE FOR THIS FOLKS.

4 YOU MAY BE EXCUSED, DOCTOR. THANK YOU FOR BEING
5 HERE.

6 THE WITNESS: OKAY.

7 HON. T.A. GREEN: NOW, I DO WANT TO GIVE DEFENSE
8 AND PLAINTIFF, IF THEY WANT, IF YOU WANT TO MAKE A
9 RECORD OF ANYTHING. I KNOW DEFENSE HAS ALREADY ASKED
10 ME. PROBABLY THE BEST THING TO DO IS, I DON'T KNOW HOW
11 MUCH MORE TIME YOU HAVE WITH THE DOCTOR AND THEN MR.
12 DAVID, PROBABLY THE AFTERNOON IS BEST IF YOU WANT TO
13 CALL WITNESSES ON YOUR MOTION.

14 I CAN PROBABLY GET THE DEPUTY SHERIFF HERE, SO --
15 AND THEN YOU CAN MAKE WHATEVER RECORD YOU WANT TO MAKE.
16 SO WE CAN DO THAT MONDAY. SO GIVEN THE FACT WE HAVE THE
17 DOCTOR AND MR. DAVID AND A RECORD TO DO, I WOULD
18 PROBABLY SAY WE'RE GOING TO ARGUE AND INSTRUCT ON
19 TUESDAY.

20 MR. GOLDBERG: I THINK THAT'S CORRECT. I THINK
21 THAT'S CORRECT.

22 MS. GAROFALO: THAT SOUNDS CORRECT.

23 HON. T.A. GREEN: AND WEDNESDAY IS AN ALL DAY
24 HOLIDAY.

25 MR. GOLDBERG: IT IS, YOUR HONOR, IT IS.

26 HON. T.A. GREEN: SO YOU HAVE TO FINISH YOUR
27 ARGUMENTS THEN ON TUESDAY.

28 MR. GOLDBERG: OKAY. WELL, WE'LL DO IT. I'M NOT

1 EXACTLY SURE WHAT'S -- THERE'S GOING TO BE A -- A DEPUTY
2 IS GOING TO BE HERE TO TESTIFY AND THEY ARE GOING TO
3 HAVE THE WITNESSES AND I DON'T EVEN UNDERSTAND WHAT --
4 WHAT'S THIS?

5 HON. T.A. GREEN: WELL, IT'S PROBABLY A MOTION
6 FOR A NEW TRIAL OR A MOTION FOR MISTRIAL.

7 MR. GOLDBERG: I DON'T KNOW WHAT IT IS.

8 MS. GAROFALO: YES, YOUR HONOR.

9 MR. GOLDBERG: WHAT'S THE MISTRIAL, YOUR HONOR,
10 THERE WAS -- THERE WAS -- THE JURY WAS IS IN THE JURY
11 ROOM AND THERE WAS SOME ALTERCATION IN THE HALL, I
12 SHOULD SAY WHAT --

13 HON. T.A. GREEN: YOU KNOW. OKAY. I UNDERSTAND.

14 MR. GOLDBERG: AND MR. DAVID HAS BEEN ACTING OUT
15 SINCE THE TRIAL BEGAN.

16 HON. T.A. GREEN: OKAY. BUT STILL I WANT TO GIVE
17 ALL COUNSEL A CHANCE TO MAKE A FACTUAL RECORD, MAKE
18 WHATEVER MOTIONS YOU WANT, SO...

19 MR. GOLDBERG: WELL, YOUR HONOR, IF THAT'S THE
20 CASE, I ALSO WANT TO BE ABLE AT THAT TIME TO SHOW THE
21 VIDEO THAT WE WANTED TO SHOW THE COURT OF HIS ACTIONS AT
22 A DEPOSITION. BECAUSE THIS BUSINESS ABOUT HIM SAYING HE
23 WAS NOT GOING TO ACT OUT AROUND ME, HE CAME TO MY OFFICE
24 AND ACTED OUT LIKE A CRAZY PERSON.

25 HON. T.A. GREEN: ALL RIGHT. FINE. IF YOU WANT
26 TO INCLUDE THAT AS PART OF THE MOTION, BE MY GUEST.

27 MS. GAROFALO: WELL, THAT HAS NOTHING TO DO --
28 OUR MOTION IS NOT TO DEFEND MR. DAVID'S CONDUCT, IT'S

1 REALLY NOT ABOUT MR. DAVID'S CONDUCT. IT'S ABOUT THE
2 FACT OF THE PRESENCE OF MULTIPLE BAILIFFS IN A COURTROOM
3 AND THE JURY WHO DIDN'T SEE WHAT HAPPENED, WHO JUST
4 HEARD YELLING IN THE HALLWAY, BUT HAD NO IDEA WHAT WAS
5 GOING ON, THAT IT WAS PRECIPITATED AND THE COURT MIGHT
6 FIND JUSTIFIABLY OR NOT, BUT BY THIS INCIDENT WITH THE
7 BAILIFF, IT HAS NOTHING TO DO WITH -- WE'RE NOT TRYING
8 MR. DAVID'S CONDUCT. HE DID WHAT HE DID.

9 HON. T.A. GREEN: OKAY, YEAH, I KNOW. I DON'T
10 AWAY TO ARGUE THIS NOW.

11 MR. GOLDBERG: YEAH.

12 HON. T.A. GREEN: BUT ACTUALLY, IT IS A LITTLE
13 BROADER THAN WHAT HAPPENED JUST IN THAT ONE INCIDENT.

14 MR. GOLDBERG: THAT'S RIGHT.

15 HON. T.A. GREEN: YOU KNOW, THIS HAS BEEN A
16 CHALLENGING EXPERIENCE FOR BENCH OFFICERS. AND I THINK
17 ONE PAPER SAID IT SHOWED THAT THE COURTS ARE
18 ILL-EQUIPPED TO HANDLE PEOPLE ON THE WITNESS STAND WHO
19 ARE UNCONVENTIONAL. AND I HAVE TO SAY IN 47 YEARS OF A
20 VERY, VARIED PRACTICE, I HAVE NEVER SEEN THIS AND AS A
21 CONSEQUENCE, YOU KNOW, WE -- WE HAD CONFERENCE TO THIS
22 BEFORE TRIAL. BEFORE I EVER GOT THE CASE, WE WERE
23 ANTICIPATING HOW -- AND STRATEGIZING HOW TO PROVIDE A
24 FORUM WHERE EVERYBODY COULD BE HEARD AND WHERE IT COULD
25 BE HEARD IN A CONGENIAL MANNER OR AS CONGENIAL AS
26 POSSIBLE, CERTAINLY AS PROFESSIONAL AS POSSIBLE, AND IT
27 HAS POSED A CHALLENGE, AND I THINK IT'S POSED A
28 CHALLENGE FOR THE SHERIFF'S OFFICE AND I CAN TELL YOU,

1 IT'S POSED A CHALLENGE FOR THE BENCH.

2 ACTUALLY, IT IS A LITTLE BROADER PROBLEM THAN
3 JUST WHAT HAPPENED YESTERDAY. BUT --

4 MS. GAROFALO: BUT ON THE MISTRIAL, IT'S NOT
5 RELEVANT TO THE ISSUE THAT'S BEING RAISED IN A MISTRIAL
6 MOTION. I MEAN, IT WASN'T EVEN IN THIS CASE, THIS
7 DEPOSITION.

8 MR. GOLDBERG: DISAGREE, YOUR HONOR, IT'S
9 RELEVANT.

10 HON. T.A. GREEN: OKAY, GUYS, TIMEOUT, TIMEOUT.
11 MERCY ON ME, I HAVE TO TAKE THE I-10 TO LA QUINTA, SO...

12 MS. GAROFALO: YOU'LL HAVE PLENTY OF TIME TO
13 THINK ABOUT THIS.

14 HON. T.A. GREEN: YEAH, BUT I WANT YOU GUYS TO
15 EXPLORE ALL FACTUAL ISSUES AND LEGAL ISSUES. I THINK
16 THIS CASES AND THESE CASES PROBABLY WILL HAVE A LIFE
17 BEYOND THE TRIAL.

18 MR. GOLDBERG: YOUR HONOR, HOLD ON JUST A SECOND,
19 YOUR HONOR, THERE'S A -- WHAT IS THIS, WHAT IS THIS?

20 MS. REEVES: IT LOOKS LIKE A RECORDING DEVICE ON
21 HIS INSTAGRAM BECAUSE HE POSTED ON HIS STORY FROM THE
22 COURTHOUSE.

23 MR. GOLDBERG: NEVER MIND, YOUR HONOR, I DON'T
24 WANT TO KEEP YOU.

25 HON. T.A. GREEN: ALL RIGHT. GUYS, HAVE A GREAT
26 WEEKEND. I REALLY APPRECIATE YOUR EXCELLENT WORK IN A
27 DIFFICULT CASE.

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(AT 3:20 P.M., PROCEEDINGS WERE ADJOURNED UNTIL
MONDAY, OCTOBER 7, 2019, AT 9:30 A.M.)

(THE NEXT PAGE NUMBER IS 3901.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 14

HON. TERRY A. GREEN, JUDGE

LAUREN REEVES,

PLAINTIFF,

VS.

HOLOGRAM U.S.A., INC., ALKI
DAVID PRODUCTIONS, INC.,
ALKIVIADES DAVID, AN INDIVIDUAL;
AND DOES 1 THROUGH 25,
INCLUSIVE,

DEFENDANTS.

)
)
)
) NO. BC643099

)
) DCA NO. B304975

)
) REPORTER'S CERTIFICATE

I, JEANESE JOHNSON, CSR NO. 11635, CERTIFIED
SHORTHAND REPORTER PRO TEMPORE, OF THE SUPERIOR COURT OF
THE STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES,
DO HEREBY CERTIFY THAT THE FOREGOING PAGES, 3601 THROUGH
3806-3900; 3901 THROUGH 4052-4200, COMPRISE A FULL, TRUE
AND ACCURATE TRANSCRIPT OF THE PROCEEDINGS AND TESTIMONY
TAKEN IN THE ABOVE-ENTITLED CAUSE ON OCTOBER 4, 2019 AND
OCTOBER 7, 2019.

DATED THIS 1ST DAY OF AUGUST, 2020.



JEANESE JOHNSON, REPORTER PRO TEMPORE

CSR NO. 11635