

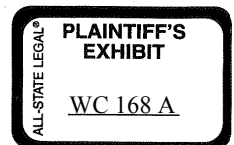
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN SOCIETY FOR THE)
 PREVENTION OF CRUELTY TO)
 ANIMALS, ANIMAL WELFARE)
 INSTITUTE,, THE FUND FOR)
 ANIMALS, and TOM RIDER.)
)
 Plaintiffs,)
) Case No. 1:03CV02006
)
 vs.)
)
 RINGLING BROTHERS AND)
 BARNUM & BAILEY CIRCUS, FELD)
 ENTERTAINMENT, INC.,)
)
 Defendants.)
 _____)

VIDEOTAPED DEPOSITION OF GERALD R. RAMOS
LAS VEGAS, NEVADA
JANUARY 24, 2007

LS & T JOB NO. 1-70262

Reported By: LISA MAKOWSKI, CCR 345



1 VIDEOTAPED DEPOSITION OF GERALD R. RAMOS,
2 taken at 3773 Howard Hughes Parkway, Third Floor
3 South, Las Vegas, Nevada, on Wednesday, January 24,
4 2007, at 10:10 a.m., before Lisa Makowski, Certified
5 Court Reporter, in and for the State of Nevada.
6

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21 * * * * *

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1 Brothers Circus?

2 A. Approximately one week.

3 Q. And how did you get that job?

4 A. I applied for the job.

5 Q. Where were you living at the time?

6 A. Las Vegas, Nevada.

7 Q. And when you were hired for the job,
8 where did you work at Ringling Brothers Circus?

9 MS. JOINER: Objection to form.

10 THE WITNESS: Can you rephrase the
11 question for me?

12 BY MS. MEYER:

13 Q. Sure. When you applied for the job and
14 then you got the job, I assume; is that correct?

15 A. Yes.

16 Q. And then where did you actually work for
17 the circus? In what city?

18 A. Oakland. I started in Oakland,
19 California.

20 Q. And again, that would have been in
21 September 2006?

22 A. Yes.

23 Q. Did you work in any other cities for the
24 Ringling Brothers Circus?

25 A. For approximately one day I worked in

1 San Jose, California.

2 Q. What were your duties when you worked at
3 the circus?

4 A. Feed the animals, clean the equipment,
5 clean up after the animals, be available for the
6 trainers or the elephant handlers if they needed
7 anything in particular done as it pertained to the
8 elephants.

9 Q. Okay. And when you say "feed the
10 animals," are you talking about the elephants?

11 A. Yes.

12 Q. When you say "clean up after the
13 animals," were you talking about the elephants as
14 well?

15 A. Yes.

16 Q. Did you receive any training for this
17 job?

18 A. No.

19 Q. Do you know which unit you were working
20 for? Which unit of the circus?

21 A. I don't understand what you --

22 Q. Do you know whether or not you were
23 working for the blue unit?

24 A. I think it was. I'm pretty sure it was
25 the blue unit.

1 Q. And who was your supervisor at the blue
2 unit?

3 A. As it related to the elephants?

4 Q. Yes.

5 A. Fellow by the name of Troy. I can't
6 recall his last name at the present time. I think
7 it's Metzler or --

8 Q. Was it Troy Metzler?

9 A. Yes. I think that was his last name.

10 Q. Mr. Ramos, do you know what a bull hook
11 is?

12 A. Yes.

13 Q. Can you tell me what it is?

14 A. It's a piece of metal that -- kind of
15 like straight piece of metal with a hook on it, and
16 it has a point at the end. Approximately, oh, I
17 would say about 2-inches in length -- or, 2 feet in
18 length.

19 Q. Did you have occasion to see bull hooks
20 when you worked at Ringling Brothers?

21 A. Several times.

22 Q. Did you see the elephant handlers
23 carrying bull hooks at Ringling Brothers?

24 A. Yes.

25 Q. Did you ever see Mr. Metzler use a bull

1 hook on an elephant?

2 A. All the time.

3 Q. Can you describe what you saw?

4 A. Are we talking about -- are you talking
5 about specifics or -- the bull hooks -- in order to
6 move the elephants, the bull hooks were employed
7 all the time.

8 Q. Did you ever see Mr. Metzler use a bull
9 hook aggressively on an elephant?

10 A. What I would consider -- pardon me?

11 MS. JOINER: Objection to form.

12 You can answer.

13 THE WITNESS: I saw Mr. Metzler take a
14 bull hook on one occasion and take the bull hook in
15 this manner, put it in the elephant's mouth, and
16 come back at a very rapid and -- and -- very rapid
17 rate in order to make the animal -- I guess the
18 animal -- I don't know what the animal was doing.
19 It was eating, and Mr. Metzler, for whatever
20 reason, put that hook in the animal's mouth and
21 came back very rapidly, what I would consider
22 rapid.

23 BY MS. MEYER:

24 Q. Which end of the bull hook did he use?

25 A. He used the hook -- hook end.

1 Q. Which city were you in when you observed
2 that incident?

3 A. That was in Oakland, California.

4 Q. Was it an adult elephant?

5 A. No. It was the smallest elephant that
6 was with the group there.

7 Q. Do you know what the elephant's name was?

8 A. No. I can't remember the names at this
9 time.

10 I think one was Elizabeth. They were
11 kind of like -- no. I think one was Elizabeth. I
12 can't remember the name of the -- all the names of
13 the elephants. That's kind of like -- just can't
14 remember them right now.

15 One was Elizabeth. I'm pretty sure was
16 Elizabeth. One had kind of like an Asian name or
17 Mideastern name. Sara -- I think one was named
18 Sara. Elizabeth, Sara, and I can't remember the
19 other four or the other five.

20 Q. Do you know if the elephant that you saw
21 Mr. Metzler use the hook on, as you described, was
22 Sara?

23 A. Like I said, I can't -- I can't place the
24 names with the size of the elephants. Some
25 appeared -- some were larger than others.

1 Q. But you said she was the smallest
2 elephant?

3 A. Yes. I think somebody said that she was,
4 like, three -- three years old. I couldn't be -- I
5 couldn't be sure, though.

6 MS. JOINER: Objection; hearsay,
7 nonresponsive. Move to strike.

8 BY MS. MEYER:

9 Q. Did you have an opportunity to observe
10 that elephant's reaction to Mr. Metzler's use of
11 the bull hook on her?

12 A. Well, she moved and made a -- made a
13 sound.

14 Q. What?

15 A. Kind of like a chirping sound or a --
16 kind of like a low-pitched sound. Her head moved
17 very rapidly in the other direction.

18 Q. Did you ever see the elephants chained
19 while you worked at Ringling Brothers?

20 A. All the time.

21 Q. What were the hours that you worked at
22 Ringling Brothers?

23 A. Normally started somewhere between seven
24 and nine in the morning.

25 Q. And how late did you work?

1 A. Probably about 12 to -- anywhere from 11
2 to 14 hours a day. Or on site and -- kind of like
3 that.

4 Q. Were the elephants chained when you came
5 to work in the morning?

6 A. Yes.

7 Q. Can you describe the condition of the
8 elephants when you arrived in the morning?

9 A. What do you mean by "condition"?

10 Q. Any observations you made about the
11 condition in which they were being kept.

12 MS. JOINER: Objection to form.

13 THE WITNESS: Okay to answer the question
14 then?

15 BY MS. MEYER:

16 Q. Yes. Go ahead.

17 A. When I came to work in the morning, the
18 elephants were always chained. Two legs were
19 always chained. Each elephant was chained one
20 front leg and one back leg.

21 There was usually -- always -- not
22 usually, always excrement -- excrement on the
23 platforms, either -- either crushed down or seemed
24 to be in its original state. And the elephants,
25 from what I could see, all of them had like green

1 marks, excrement marks, and traces of green
2 substance on their bodies.

3 Some of them were -- were laying in the
4 excrement when I did arrive there, trying to,
5 because I guess they had a problem with one leg
6 being chained and trying to lay down and stuff.

7 But they -- each morning I came, at least
8 one or two of the elephants were laying in the
9 excrement, and the ones that were standing had
10 green marks all over them, on their trunks and on
11 their sides and their legs, on their underbelly.

12 Q. And was the youngest elephant, who you
13 described earlier, also in chains?

14 A. Yes.

15 Q. And when you said the elephants -- you
16 saw the elephants on chains all the time, was that
17 true of the youngest elephant as well?

18 A. Let me -- let me clar -- let me clarify
19 that.

20 Other than them going and -- during the
21 day, when they were doing their shows, they were
22 not chained. They would go do their shows and then
23 come back.

24 The larger elephant was always chained.
25 There's one big elephant there that was always

1 chained.

2 MS. CROWLEY: Mr. Ramos, listen to the
3 question. She asked you about the baby elephant.

4 THE WITNESS: Okay. The baby elephant.
5 She was loose sometimes during the day and chained
6 sometimes.

7 BY MS. MEYER:

8 Q. Can you tell me which times during the
9 day elephants were not on chains?

10 A. When -- obviously, when they were in the
11 show and when they were out front for the people --
12 the people would come through and they would see
13 the elephants out front there.

14 Some would be inside the tent, chained,
15 with one leg chained.

16 If the larger elephant -- I forget what
17 her name was -- was out front, she would always be
18 chained, at least the one leg. There would be a
19 stake in the ground, a big stake, metal stake with
20 a chain on it. And she would always be chained.

21 Q. Do you know what elephant that was, her
22 name?

23 A. I can't remember. She was one of the
24 larger ones, and I can't remember her name.

25 But she was the one that, for whatever

1 reason, seemed to be chained all the time, day and
2 night, if she wasn't in the show.

3 Q. Was there a particular Ringling Brothers
4 handler who seemed to be in charge of that
5 elephant?

6 A. What do you mean by "seemed to be in
7 charge"? I don't understand.

8 Q. Was there any particular handler who you
9 saw with that elephant more than others?

10 A. Not really, no.

11 It seemed to be a standard operational
12 procedure to make sure that that one elephant was
13 subdued to some degree.

14 Q. And when did you -- when did you leave
15 the circus?

16 A. I left the circus in approximately a
17 week.

18 Q. Why did you leave the circus?

19 A. I just couldn't -- I just couldn't
20 believe what was -- what was taking place there. I
21 just -- just -- I just didn't like what was going
22 on, just that simple.

23 Q. What do you mean by that?

24 A. Well, the treatment of the animals. I
25 just -- I didn't like the job, let's put it that

1 way.

2 MS. MEYER: I have no further questions.

3 MS. CROWLEY: Can we just take a
4 five-minute break?

5 MS. MEYER: Sure.

6 THE VIDEOGRAPHER: Off the record at
7 10:27.

8 (A recess was taken.)

9 THE VIDEOGRAPHER: Back on the record at
10 10:34.

11 EXAMINATION

12 BY MS. JOINER:

13 Q. Mr. Ramos. My name is Lisa Joiner. I'm
14 counsel for Feld Entertainment.

15 Do you recall you actually worked for the
16 circus in August, rather than September of 2006?

17 A. To best of my recollection, it was
18 September. It might have been August, but...

19 Q. Okay. What is your current street
20 address now in Las Vegas?

21 A. 21 -- 218 South 11th Street, Apartment D,
22 like in dog. It's Las Vegas, Nevada 89101.

23 Q. That's also where you had that apartment
24 and you were living also in August; is that
25 correct?

1 consider subordinates to the trainers or the
2 handlers, if you will.

3 So those are -- I worked with a little --
4 I think his name was -- might have been Dave. A
5 fellow by -- a tall fellow by the name of Casey,
6 another short fellow, and a young lady, that were
7 in the same capacity I was.

8 Q. Did you all work the same shift?

9 A. Yes.

10 Q. That would have been during the day?

11 A. Yes.

12 Q. Did Mr. Metzler tell you anything else
13 about the elephants?

14 MS. CROWLEY: Objection; vague. Can you
15 be more specific? At a particular time? Are you
16 talking throughout his -- duration of his
17 employment?

18 BY MS. JOINER:

19 Q. Yeah. During the five days that you were
20 employed, you told us that Mr. Metzler told you to
21 stay away from the elephants and don't go near them
22 without a trainer.

23 Did he tell you anything else about the
24 elephants?

25 A. He says -- he said they were not --

1 they're animals; they are not pets. Quote,
2 unquote. "They're dangerous animals, not pets."

3 Q. Did he talk to you about any of your
4 duties or responsibilities?

5 A. Basically. Not on a verbatim, but to the
6 best of my recollection and best of my -- way he
7 said things to me is just, they'll show you what
8 needs to be done around here. And the other
9 fellows in my capacity, they showed me what needed
10 to be done, and basically just follow their lead.

11 Q. Okay. So back to the question about
12 training.

13 Did you review any kinds of rules, any
14 kind of videos, any kind of orientation that you
15 had?

16 A. Yes. I saw a couple of videos in the
17 trailer in San -- San Diego. San Diego. I think
18 it was in San Diego I saw some videos which --
19 well, they kept going off and on and the sound kept
20 going off and on. But basically just left there to
21 look at videos. And the video supposedly kept
22 going off and on. And it came to an end and then
23 they came. Okay, fine, da da da da, fill this out.
24 Kind of like that.

25 It was a very -- very casual type

1 and everything was in order, make sure that
2 everything was -- at least I did -- make sure
3 everything was safe and the tent was secure. Just
4 basic things like that, but didn't -- basically,
5 didn't go near the elephants.

6 Q. And after the tent was secure, did you
7 have any other duties?

8 A. Just whatever -- just whatever needed to
9 be done out there. The trainers, they come out --
10 the handlers say do this or that, get the elephants
11 some food or -- just whatever -- you had to just be
12 there in case they needed something done.

13 Q. Were the elephants in their pens at that
14 time?

15 A. They didn't have pens.

16 MS. CROWLEY: Objection; no foundation.

17 THE WITNESS: The elephants don't have
18 pens. They're chained up. They have platforms
19 they're chained to and -- they have wooden
20 platforms that they're chained to.

21 BY MS. JOINER:

22 Q. Do you remember seeing an electric fence
23 while you were there?

24 A. Somebody -- this is just hearsay now --
25 somebody mentioned there was an electric fence

1 wasn't a lengthy type thing. It was very brief.

2 It was, Hi, how are you?

3 I thought he was with the newspaper. Had
4 a camera. And he says -- I think he said he was
5 with some activist group or something, or SPCA or
6 something like that. I says I don't -- didn't
7 talk -- didn't talk much.

8 Q. Do you remember if he told you his name?

9 A. He might have. I think -- I think he
10 might have, but I don't -- I don't -- I don't
11 recall his name.

12 Q. Was it Mr. Cuvello [phonetic]?

13 A. I couldn't say one way or the other. I
14 just -- I was -- didn't really pay much attention.
15 Just gave me a card. And I think I gave him my --
16 hey, if you want to talk about it, here's my --
17 here's my phone number. And they contacted me, and
18 kind of like that.

19 Q. When you were at the circus, did you talk
20 to anybody at all about your concerns about how the
21 animals were treated?

22 A. Not really, other than -- other than
23 Casey. I spoke with Casey, and Casey said that --
24 I think the first time they beat on the animals.
25 But I don't know what -- I don't want to be getting

1 anybody in trouble.

2 MS. CROWLEY: Just answer the question.

3 That's okay. Just answer the question.

4 THE WITNESS: He said, "This isn't the
5 first time they beat on those animals." And the
6 other fella says, "Yeah." Says, "One of the
7 animals went crazy in the big -- big tent one time,
8 and after they got him back -- after they got him
9 subdued in the circus, they brought him back and
10 wailed on him."

11 But the animal -- I think it was -- they
12 sent the animal back. I guess it's in the funny
13 farm now or something like that.

14 But the other fellow said he seen them
15 beat on the animals. And I said, Well -- I says,
16 Man -- I said, "I don't need a job that bad."

17 BY MS. JOINER:

18 Q. Is Casey a man or a woman?

19 A. It's a male.

20 Q. Do you remember what his position was?

21 A. Same as mine, caretaker.

22 Q. And who was the second person?

23 A. I can't remember his name. There was
24 one, two -- it was five of us -- to the best of my
25 recollection, there was five of us that were kind

1 of like caretakers.

2 He said people are always coming and
3 going. When I had got there, one guy had just
4 quit, but he didn't quit the circus. I think he
5 went to work in the arena.

6 Q. You had referenced earlier an incident
7 that you witnessed with Mr. Metzler.

8 Do you remember that?

9 A. With the bull hook?

10 Q. Yes.

11 A. Yes.

12 Q. You described earlier for us.

13 A. That was -- there was -- there was a
14 couple other ones where he took the hook --

15 MS. CROWLEY: Wait until she asks the
16 question.

17 BY MS. JOINER:

18 Q. Sorry. I'm trying to be accurate here.

19 A. That was in Oakland.

20 Q. Okay. So that was in Oakland.

21 What was the elephant doing?

22 A. He was next to the -- he was next to the
23 other elephants, the bigger elephants. It was the
24 baby elephant, always the baby elephant. She
25 seemed to be the one that was a little bit more

1 independent, so to speak, and hadn't had enough
2 hits over the head or bull hooks in the mouth, I
3 guess, to -- to -- to get the message instilled in
4 her.

5 She was next to some of the elephants
6 there and drinking. Either -- one time she was
7 drinking water and eating some hay from a pile
8 and -- next to the elephants, next to the bigger
9 ones. And he wanted her, I guess, away so he put
10 the bull hook right in her mouth and kind of
11 like -- and that was -- that was interesting.

12 And another time he put -- she didn't
13 want to -- I guess she didn't want to move.
14 Anyway, for whatever reason, he took the bull hook
15 and hit her over the head with it.

16 Q. Now, this elephant that you keep
17 referring to is the baby elephant?

18 A. The baby elephant. That would --

19 Q. Do you have any age?

20 A. I really couldn't say. It was smaller
21 elephant, smaller than the other ones. But they
22 kept referring to her as "the baby." That was the
23 baby elephant.

24 Q. After you spoke with the attorneys in
25 September or October, did somebody come here to

1 Q. Did she tell you who the five plaintiffs
2 in the case were?

3 A. She might have, but I really didn't pay
4 attention to it.

5 Q. What else did you discuss with her?

6 A. That's about it. Just my -- my
7 experiences with the circus, as it pertained to the
8 elephants. That's about it. Basically, the same
9 thing I'm telling you, what took place with the
10 elephants.

11 Q. And then did you have any additional
12 contact with Plaintiffs' counsel after that?

13 A. No. This is -- this is only the second
14 time I've met someone from the law firm here.
15 Tonya and Katherine here.

16 Q. Did you meet with Ms. Meyer before your
17 deposition today?

18 A. No. Uh-uh.

19 Q. So you mean -- when you say met with her,
20 you mean here at the deposition?

21 A. Yeah. This is the first time I've even
22 laid eyes on her --

23 Q. Okay.

24 A. -- or spoke with her for that matter.

25 Q. Have you done any kind of volunteer work

1 with any animal rights groups?

2 A. No.

3 Q. Okay.

4 A. I don't belong to any animal rights
5 groups.

6 Q. How did you find your counsel for today?

7 A. Tonya said that -- contact the -- this
8 law firm. They might be able to represent you in
9 the -- in the deposition.

10 Q. What is the name of your attorney here
11 today?

12 A. Amanda -- Amanda Cowley.

13 Q. Are you paying for her?

14 A. No. She's pro bono.

15 MS. JOINER: Let's take a five-minute
16 break, and I'll make sure I don't have anything
17 else. Okay?

18 THE VIDEOGRAPHER: Off the record at
19 12:00.

20 (A brief recess was taken.)

21 THE VIDEOGRAPHER: Back on the record at
22 12:10.

23 MS. JOINER: I have nothing further.
24
25

FURTHER EXAMINATION

BY MS. MEYER:

Q. Mr. Ramos, I would like you to take a look at Exhibit 2, which is the --

MS. MEYER: Actually, let's switch again. That's a good idea. Sorry. Off the record here.

(Thereupon, a brief off-the-record discussion was held.)

THE VIDEOGRAPHER: Back on the record. It's 12:11.

BY MS. MEYER:

Q. Mr. Ramos, I would like you to take a look at Exhibit 2, which is your application for employment with Feld Entertainment.

Were you under oath when you signed that application?

A. No.

Q. But you're under oath today; aren't you?

A. Yes.

Q. Would you actually refer to page 2 of that exhibit --

A. Uh-huh.

Q. -- for me?

And I just want you to read to yourself, before I ask you a couple of questions, the first

1 paragraph at the bottom that starts with "I
2 understand." Just read that paragraph to yourself.

3 A. "I understand that --

4 Q. No. Just silently. I'm sorry.

5 A. Okay.

6 Q. Let me know when you're done reading just
7 that first paragraph.

8 A. Oh, just the first one. I'm done with
9 it, yeah.

10 Q. Okay. And did you, on page 2 of
11 Exhibit 2, authorize Feld Entertainment to
12 thoroughly investigate the information included on
13 your employment application?

14 A. I authorized them to do whatever makes
15 them feel comfortable with me being employed with
16 them.

17 Q. I'm asking you a very specific question
18 based on that first paragraph.

19 A. Yes, yes, yes.

20 Q. Again, I'll just repeat it. And wait
21 until I'm done until you answer it; okay?

22 Did you authorize Feld Entertainment to
23 thoroughly investigate the information included on
24 your application?

25 A. I certainly did, yes.

1 Q. Did you authorize Feld Entertainment to
2 thoroughly investigate that information for the
3 purposes of deciding whether or not to hire you?

4 A. Yes.

5 Q. And if Feld Entertainment had
6 investigated your criminal background, is there any
7 reason why they would not have found out about your
8 criminal record?

9 A. No. Public record.

10 Q. Okay.

11 A. I thought I checked that "yes," but
12 evidently I put "no" on this.

13 Q. You mentioned a conversation you had with
14 an individual at Ringling Brothers named Casey.
15 And you mentioned in your response to questions
16 from Defendant's counsel that Casey recounted an
17 incident that he apparently observed, which
18 involved Troy Metzler or somebody else wailing on
19 some elephants.

20 Do you remember that testimony?

21 MS. JOINER: Objection to form,
22 mischaracterizes prior testimony --

23 MS. MEYER: Could you read --

24 MS. JOINER: -- assumes facts not in
25 evidence.

1 their food or hay or whatever they did, and the
2 public could view them. But it was a lot bigger.

3 Q. But, again, did the public have access --
4 did the public view the elephants when they were
5 inside the tent?

6 A. Only if the -- only if the sides of the
7 tent were up. If the sides of the tent were up --
8 there was only an entrance to the tent, and the
9 public could not see what was going on inside the
10 tent there, only when the elephants were outside
11 the tent.

12 Q. Was -- were -- was the public allowed
13 inside the tent?

14 A. No, no.

15 MS. MEYER: I have no further questions.

16 Actually -- I'm sorry. I do. I do have
17 another question.

18 BY MS. MEYER:

19 Q. You testified in response to one question
20 from Ms. Joiner that you saw Troy Metzler hit the
21 baby elephant over the head with a bull hook.

22 Do you remember that testimony?

23 A. Yes.

24 Q. Did Mr. Metzler use force when he hit the
25 elephant over the head with the bull hook?

1 MS. JOINER: Objection; vague.

2 BY MS. MEYER:

3 Q. Can you describe what you saw?

4 A. Well, to -- to put it in context, have
5 you ever seen anybody swing a baseball bat -- a
6 baseball player swing a baseball bat? Kind of like
7 that, but over the head.

8 MS. MEYER: I have no further questions.

9 MS. JOINER: I have no further questions.

10 Thank you.

11 THE VIDEOGRAPHER: Off the record at
12 12:25.

13 THE REPORTER: Do you want a copy?

14 MS. JOINER: Yes.

15 MS. MEYER: Ordering.

16 (Thereupon, the taking of the deposition
17 was concluded at 12:25 p.m.)

18

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25