

ROUGH DRAFT

UNCERTIFIED

UNEDITED

70

DRAFT - EDWARD MAGEDSON - 6/2/10

*** UNEDITED UNCERTIFIED TEXT ***

A. I went through every -- hundreds and hundreds of e-mails and looked for the attachment that comes from my service and listened to them.

Q. What service do you use to record the phone calls?

MR. GINGRAS: Object.

THE WITNESS: You know, I'm not going to answer that question.

MR. GINGRAS: Objection. This is one of those protective order issues. We will be happy to provide that information subject to a protective order but not without one.

MR. BLACKERT: Okay. Objection noted.

THE WITNESS: And I would -- sorry.

Q. BY MR. BLACKERT: Since when did you start recording phone calls?

A. I want to say it's more than two years ago.

Q. More than two years ago?

A. It could be more than three years ago.

Q. Why did you start recording phone calls?

A. Why did I start recording phone calls?

Because of threats, death threats, because -- so somebody couldn't say I said something like your clients saying in

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detail handwritten notes and date and time and da da da saying I said certain things, which we all know never happened, nothing even close.

Q. Do you notify callers that you record telephone conversations?

A. I'm a one party -- Arizona is a one party state.

Q. So why don't you notify callers?

A. Well there is -- there is notification on the recording. If you listen, before it comes to me, there is a part that says calls may be recorded.

Q. What specific language I'm asking for?

A. I don't remember and I don't call myself, so I can't remember.

Q. Yeah, I'm going to make a request for that voice recording, the actual system that you use the prompts and everything, I will make a request for that.

A. Anyone can do that. You can call a number and get them all yourself.

Q. How long is that particular prompt -- okay. Let's back up. The prompt that my clients went through?

A. Uh-huh.

Q. How long had that been in existence for?