

EXHIBIT C
(PART 2 OF 2)

1 MR. McDONOUGH: Objection. Vague as to time.
 2 THE WITNESS: You're referring to between 7:15
 3 and 8 o'clock?
 4 BY MR. CALABRO:
 5 Q From the time that -- at 7:15 you made a
 6 call --
 7 A Yes.
 8 Q -- to the MTAs? You then talk to Mr. Williams
 9 and tell him what happened on the call, and then you
 10 went to the podium?
 11 A Yes.
 12 Q From that time until you called the yard staff
 13 to escort Mr. Williams to the MTA clinic, did you ever
 14 leave the podium?
 15 A Yes.
 16 Q What for?
 17 A To -- to observe.
 18 Q Do you remember how many times you did that?
 19 A No, I don't.
 20 Q Do you remember when that was?
 21 A No, I can't recall exactly when.
 22 Q Do you have any estimate of time, how long you
 23 were on the podium?
 24 A No, I don't.
 25 Q Do you have any estimate of time as to how long

1 A No, I just took his word that he was having
 2 pain and I called the MTAs.
 3 Q What kind of pain was it?
 4 A Chest pains, I believe.
 5 Q What do you base that belief on?
 6 A Because he was having trouble breathing.
 7 Q What was his tone of voice?
 8 A It was calm.
 9 Q Did he appear to be having chest pain?
 10 A No.
 11 Q Did he appear to be having trouble breathing?
 12 A No.
 13 Q Did you make any call to the MTA right then?
 14 A Right then? No, I immediately -- I just had
 15 him escorted to the MTA.
 16 Q Did you know that there was personnel at the
 17 MTA then?
 18 A Did I -- I can't recall if there was.
 19 Q I guess what I'm confused about is why you
 20 immediately called an escort at this time without
 21 calling the MTAs first when you say you've never done
 22 that before.
 23 MR. McDONOUGH: Object. Objection.
 24 Argumentative. I don't think there's a question there
 25 either.

1 you were observing down away from the podium?
 2 A No, I don't.
 3 Q In between -- okay, so how did Mr. Williams
 4 notify you that his pain was increasing?
 5 A I'm sorry?
 6 Q How did he notify you that his pain was
 7 increasing?
 8 A He called me. I believe he called me to the --
 9 to his cell and told me.
 10 Q It was Mr. Williams himself?
 11 A Yes.
 12 Q What did he say?
 13 A That his pain was increasing and he needs to
 14 see the MTAs.
 15 Q Were you confused what he meant by his pain?
 16 A No.
 17 Q Because this has been the first you heard of
 18 his pain; right?
 19 A Yes.
 20 Q Because you said up here he only said -- he
 21 only talked about trouble breathing?
 22 A That's correct.
 23 Q So this is the first you heard of his pain and
 24 said it was increasing. Were you confused as to what
 25 pain he was talking about?

1 BY MR. CALABRO:
 2 Q Can you explain why?
 3 MR. McDONOUGH: What's the question? You said
 4 you were confused.
 5 MR. CALABRO: You often object while I'm asking
 6 the question.
 7 MR. McDONOUGH: Okay, I apologize. I don't
 8 mean to do that, so I probably cut you short. I'm
 9 sorry, go ahead.
 10 MR. CALABRO: Let's start again.
 11 MR. McDONOUGH: Okay.
 12 BY MR. CALABRO:
 13 Q My question is: I'm confused as to why you
 14 didn't call the MTA immediately before calling -- or at
 15 least before calling the yard staff to escort him to the
 16 MTA when before, in the past, you said that you always
 17 call the MTA before you send somebody there.
 18 A Because I already called the MTAs and let them
 19 know what the situation was.
 20 Q And when you called them, you said that they
 21 weren't there, right?
 22 A The first time?
 23 Q Right.
 24 A I didn't say that.
 25 Q So the MTAs were in the facility at 7:15?

1 A Yes.
2 Q They could have received him as a patient at
3 7:15?
4 MR. McDONOUGH: Objection. Speculative.
5 THE WITNESS: I don't know if they could have
6 or not.
7 BY MR. CALABRO:
8 Q Well, this was somebody staffing the clinic at
9 7:15 p.m.?
10 A Yes.
11 Q Do you remember who you talked to at 7:15?
12 A I remember that it was Nurse Andrews and -- and
13 Ibarra on duty that day, I don't recall exactly which
14 one I talked to.
15 Q But you remember talking to a nurse at 7:15?
16 A Correct.
17 Q At Facility B Health Services?
18 A That's correct.
19 Q Why didn't you send Mr. Williams directly there
20 at 7:15?
21 A Because they told me that they were unable to
22 see him at that time unless it was an emergency.
23 Q Why did you not call facility services the
24 second time Mr. Williams called you over?
25 A Because I've already called them the first time

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1 to let them know his situation.
2 Q How did you know that -- did you now think it
3 was an emergency?
4 A No, but he wasn't -- he wasn't in pain the
5 first time. I just let them know that he was having
6 problems and they said they couldn't get him at the
7 time, but he said his pain was increasing. Just to be
8 on the safe side, I sent him to the MTAs.
9 Q So it is your testimony that he was feeling no
10 pain at 7:15?
11 A Not that I was aware of.
12 Q He did not tell you he was having pain at 7:15?
13 A That's correct.
14 Q He didn't appear to be in pain at 7:15?
15 A That's correct.
16 Q In your opinion?
17 A Yes. Can I clarify something?
18 Q Sure, absolutely.
19 A You said in my opinion, and also I was not --
20 he did not tell me he was in pain either, so I was not
21 aware because he didn't tell me, and plus, he did not
22 appear to be in pain.
23 Q Okay. The second time he called you over he
24 appeared to be in pain?
25 A He didn't appear to be, no.

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1 Q He told you he was in pain?
2 A Yes.
3 Q So you decided to immediately call yard staff
4 to escort him to the MTA facility?
5 A That's correct.
6 Q How long did it take the staff to arrive?
7 A Within -- within a few minutes.
8 Q Do you know how long it took them to arrive at
9 the MTA facility?
10 A No, I don't.
11 Q Did you talk to -- do you know -- do you
12 remember the yard staff that you called -- do you
13 remember the names of the yard staff that you called to
14 escort him to the MTA facility?
15 A Not their names, no.
16 Q You don't remember who they are now either?
17 A No.
18 Q Did you ever talk to those same guards later
19 that night?
20 A Not that I can recall, no.
21 Q Did you ever follow up with Mr. Williams to
22 find out what was wrong with him?
23 A No, he did -- he told me that -- I can't recall
24 when he told me, but he did tell me he did have to go to
25 CTC to get an EKG done. That was the last -- that's all

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1 he said to me.
2 Q I want to come back to this time frame. You
3 said that there was 45 minutes that elapsed between 7:15
4 p.m. when you called the MTA and when you called -- when
5 Mr. Williams called you back over and you called -- and
6 you sent him to the MTA, you said there was 45 minutes
7 that passed?
8 A Um-hmm.
9 Q And you were pretty confident in that 45-minute
10 number?
11 A Yes.
12 Q But you're not confident about other details;
13 for example, you don't know if Mr. Williams' cellmate
14 was there, you don't know how long you spent on the
15 podium, you don't know how long you were at -- in the
16 guard -- you know, off the podium in between then. You
17 don't have any idea about these details. How can you be
18 so certain about the 45 minutes that elapsed between the
19 calls to the MTAs the first time and the call to the
20 MTAs the second or sending him to the MTAs the second
21 time Mr. Williams called you over?
22 MR. McDONOUGH: I'm going to object as
23 argumentative and compound and ambiguous.
24 THE WITNESS: That's just what I recollect.
25 BY MR. CALABRO:

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1 Q Do you not find it curious that that's the only
2 detail you remember?
3 MR. McDONOUGH: Objection. Mischaracterization
4 of the testimony, argumentative.
5 THE WITNESS: No.
6 BY MR. CALABRO:
7 Q Is there any particular reason why that 45
8 minutes sticks in your head but the other details don't?
9 A I believe I said it was approximately 45
10 minutes, so it could have been 40, it could have been
11 50, but no, there's no reason.
12 Q Did any other guard -- or not guard, excuse me.
13 Did any other inmate come up to you during this time and
14 tell you that Mr. Williams was in pain?
15 A Not that I can recall.
16 Q Do you know an inmate by the name of Jeffrey
17 Moore?
18 A Yes.
19 Q Do you know -- do you remember where his cell
20 was on September 6th, 2003?
21 A Not -- not exactly. I can -- I can recall the
22 area but not his exact cell.
23 Q Do you remember the area? What was the area?
24 A I believe it was on the top tier in B section.
25 Q Do you remember him coming up to tell you that

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1 if I told you that Mr. Perkins was Mr. Williams'
2 cellmate at the time?
3 A It would be -- sounds -- it could be, yes.
4 Q Do you remember talking to Mr. Perkins at any
5 point during this time on September 6th, 2003?
6 A Not that I recall, no.
7 Q Do you -- do you deny talking to him?
8 A No.
9 Q Was Mr. Roach, Officer Roach, was he working
10 with you in B building on September 6th, 2003?
11 A In Building 5 on third watch?
12 Q I'm sorry, Building 5.
13 A Yes, from 1400 to 2200 hours.
14 Q Do you remember where he was at 6 o'clock p.m.?
15 A No, I can't recall where he was.
16 Q Do you remember where he was at 7 o'clock p.m.?
17 A Not exactly, no.
18 Q Not exactly. Do you have any idea where he was
19 at 7 o'clock?
20 A I can't recall, no.
21 Q Do you know where he was at 7:15 when you made
22 the call to the MTAs?
23 A I can't recall exactly where he's at now.
24 MR. CALABRO: Do you guys want to take a
25 break --

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1 Mr. Williams was having a problem, chest pains?
2 A On that date, September 6th?
3 Q On this date, September 6th.
4 A No, I can't recall.
5 Q Do you deny that he did?
6 A No, I don't deny that he did.
7 Q Do you remember -- do you know an inmate by the
8 name of Charles Jordan?
9 A Yes.
10 Q Do you remember where his cell was on -- on
11 September 6th of 2003?
12 A Approximately, yes.
13 Q Where was his cell?
14 A On the first-tier section in B -- in B section.
15 Q Do you remember him coming up to tell you that
16 Gerry Williams was having chest pains?
17 A No, I don't.
18 Q Do you deny that he did?
19 A No, I'm not denying that he did.
20 Q Do you know an individual by the name of John
21 Perkins, an inmate by the name of John Perkins?
22 A Yes.
23 Q Do you remember where his cell was?
24 A The area B section, first tier.
25 Q Would it be consistent with your recollection

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1 MR. McDONOUGH: Are you ready?
2 MR. CALABRO: -- for lunch?
3 MR. McDONOUGH: I could take a break.
4 (Discussion off the record.)
5 (Record read.)
6 BY MR. CALABRO:
7 Q Do you have any idea where he was?
8 A No.
9 Q Do you remember Mr. Williams -- Mr. -- I'm
10 sorry. Start again.
11 Do you remember Officer Roach at any point that
12 night on September 6th, 2003?
13 A Can you clarify?
14 Q I mean, do you remember anything about where he
15 was, what he was doing at all on September 6th, 2003?
16 A Yeah.
17 Q What do you remember?
18 A I remember him helping me release the dayroom.
19 Q Okay. Anything else?
20 A I remember him cell feeding with me, that's
21 about it.
22 Q When was the -- when was the date -- the cell
23 feeding was 4:00 to 6:00, is that right, 4:00 to 6:00
24 cell feeding?
25 A Sounds about right.

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1 Q Do you remember observing Officer Roach at any
2 time between 6 o'clock and 8 o'clock p.m.; do you know?
3 A Observe him, yes.
4 Q Did you ever see a -- did you ever see Officer
5 Roach talk to Gerry Williams?
6 A Not directly, no.
7 Q Do you know if Officer Roach talked to Gerry
8 Williams that night?
9 A No, not that I know of.
10 Q Did you hear Officer Roach talk to Gerry
11 Williams?
12 A No.
13 Q From somebody else?
14 A No.
15 Q Did you see Officer Roach talk with Jeffrey
16 Moore at any point on September 6th, 2003?
17 A Not that I can recall.
18 Q Have you -- have you heard anything about
19 Jeffrey Moore talking with Officer Roach on September
20 6th, 2003?
21 A No.
22 Q Have you heard anything about Charles Jordan
23 talking to Officer Roach on September 6th, 2003?
24 A No.
25 Q Did you see Charles Jordan talk to Officer

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1 counting inmates when you were counting inmates; is that
2 right?
3 A Yes.
4 Q Was there anything else -- was there anything
5 else that you saw Officer Roach do that day, that you
6 remember?
7 A On that -- on that date, no.
8 Q September 6th, 2003?
9 A No, not that I can recall.
10 Q And you don't remember any conversations with
11 him on September 6th, 2003?
12 A No.
13 Q Did you ever ask him to call for medical
14 assistance for Mr. Williams?
15 A No, I didn't.
16 Q Did he ever talk to you about medical
17 assistance for Mr. Williams?
18 A No.
19 Q And you never told him to go call for medical
20 assistance?
21 A Told Officer Roach?
22 Q Right.
23 A No, I called myself.
24 Q Who else was working with you in Building B5 on
25 September 6th, 2003?

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1 Roach on September 6th, 2003?
2 A No, not that I can recall.
3 Q Did you hear anything about John Perkins
4 speaking with Officer Roach on September 6th, 2003?
5 A No.
6 Q Did you see John Perkins speak with Officer
7 Roach on September 6th, 2003?
8 A No.
9 MR. CALABRO: We can do a lunch break now if
10 you want.
11 (Lunch recess 1:20 p.m. - 2:05 p.m.)
12 (Record read.)
13 BY MR. CALABRO:
14 Q So your recollection, to the best of your
15 ability, is that Officer Roach was with you when you
16 were cell feeding; is that right?
17 A Yeah.
18 Q I'm just trying to remember. He was with you
19 when you were cell feeding or he was cell feeding at the
20 same time you were cell feeding?
21 A Yeah.
22 Q And he was also helping you with the day
23 release (sic); is that right?
24 A Yes.
25 Q He was also there during the count? He was

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1 A We had a control booth officer, but I can't
2 recall his name.
3 Q Would this -- would this officer have seen --
4 been able to have seen Inmate Williams on September 6th,
5 2003, in his cell?
6 A He could --
7 MR. McDONOUGH: Objection. Calls for
8 speculation.
9 THE WITNESS: He could have.
10 BY MR. CALABRO:
11 Q Did you ever speak to him about Officer (sic)
12 Williams on September 6th, 2003?
13 A No.
14 Q Do you know whether he remembers any of this
15 incident, this incident where Officer (sic) Williams
16 asked for medical assistance on September 6th, 2003?
17 MR. McDONOUGH: Objection. Calls for
18 speculation.
19 THE WITNESS: I don't know if he does.
20 BY MR. CALABRO:
21 Q You don't know?
22 A No.
23 Q You never talked to him about it?
24 A No.
25 Q You never heard anybody saying that he knows

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1 certain information?
 2 A Not that I know of.
 3 Q I'm going to hand you an exhibit. This is one
 4 of the ones we used yesterday, but I think we decided to
 5 start numbering over again.
 6 MR. McDONOUGH: Okay. And this is a
 7 document --
 8 MR. CALABRO: This is the 602.
 9 MR. McDONOUGH: Okay.
 10 MR. CALABRO: Do you want a copy?
 11 MR. McDONOUGH: Well, I can look on.
 12 (Deposition Exhibit 13 marked.)
 13 MR. McDONOUGH: I would just note, my personal
 14 recollection, I don't know, did we -- if we got into
 15 this inmate appeal yesterday or not. Did we have two --
 16 two exhibits yesterday?
 17 MR. CALABRO: Yes.
 18 MR. McDONOUGH: Oh, we did, all right. I just
 19 can't remember.
 20 BY MR. CALABRO:
 21 Q Do you recognize this form?
 22 A Yes.
 23 Q What is it?
 24 A It's a 602 appeal form.
 25 Q And this is Exhibit 113 -- or 13. Could you

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1 A Yes.
 2 Q Is it important to be complete?
 3 A Yes.
 4 Q Were you accurate when you filled out this
 5 form?
 6 A As accurate as I could be, yes.
 7 Q Well, let's make sure. Did you fill out this
 8 form?
 9 A Yes.
 10 Q If you look at section C, is that your
 11 signature where it says "Staff Signature"?
 12 A Yes, that's my initials.
 13 Q So when you filled out this form, were you
 14 complete when you filled out this form?
 15 A No, I was not complete.
 16 Q Were you accurate in the statements you made?
 17 A Yes, I was accurate.
 18 Q Let's walk through section C. It says, "MTA
 19 was notified immediately" -- stop me if I'm reading
 20 incorrectly. "MTA was notified immediately (Ibarra and
 21 Andrews, LVN's) and they notified me they were going to
 22 check his file and get back to me. As his pain
 23 increased I notified yard staff to escort him to the MTA
 24 office. The time was approximately 17" -- or excuse me,
 25 "1915 hours, just after evening dayroom release. At

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1 describe what this is?
 2 A It's an inmate appeal form.
 3 Q What are these used for?
 4 A For inmates to appeal a policy, action or
 5 decision against them.
 6 Q Have you ever reviewed this -- do you recognize
 7 this particular form?
 8 A Yes.
 9 Q What is this one?
 10 A This is an appeal form from Gerry Williams.
 11 Q Against?
 12 A Appears to be against his medical attention.
 13 Q What officers is he naming in this appeal form?
 14 A Myself and CO Roach.
 15 Q Now, you had an opportunity to review this form
 16 before?
 17 A Yes.
 18 Q In fact, it was one of the documents that you
 19 showed me that you reviewed for this deposition; isn't
 20 that right?
 21 A Yes.
 22 Q When you fill out these forms, is it important
 23 to be accurate?
 24 A To a certain degree, yes.
 25 Q Is it important to tell the truth?

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1 about 1800 hours I was cell feeding in Building 1, and
 2 not aware of his condition." Is that right?
 3 MR. McDONOUGH: I would just note that it's
 4 "Bld 1."
 5 MR. CALABRO: I'm sorry, "Bld 1."
 6 Q Is that -- is that right, did I read that
 7 correctly?
 8 A That's correct.
 9 Q So this says that you were -- you notified an
 10 MTA immediately. Immediately after what?
 11 A Immediately after he told me he was having
 12 trouble breathing.
 13 Q Okay. And that's -- and so what time would you
 14 say that was?
 15 A That was probably 1915 hours.
 16 Q That was 1915 hours? So you notified them
 17 immediately, and that immediately -- you first notified
 18 them at 1915 hours; right?
 19 A Yes.
 20 Q "They notified me they were going to check his
 21 file and get back to me. As his pain increased, I
 22 notified yard staff to escort him to the MTA office.
 23 The time was approximately 1715 (sic) hours." You see
 24 that?
 25 A Yes, I do.

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1 Q So this says that you sent him to -- you called
 2 yard staff at 1715 (sic) hours, isn't it?
 3 A Well, that's not what I meant.
 4 Q You just told me that you were accurate --
 5 A Yeah.
 6 Q -- on this form. How do you explain the
 7 difference?
 8 A Well, that's -- that's what I meant --
 9 MR. McDONOUGH: Objection. Vague and
 10 ambiguous.
 11 THE WITNESS: That's what I meant when I wrote
 12 it.
 13 BY MR. CALABRO:
 14 Q Why didn't you put down the time that you
 15 actually sent him to the MTA office with the yard staff
 16 escort?
 17 A I didn't know I had to.
 18 Q You just said that you knew it was important to
 19 be complete.
 20 A Yes, it is important to be complete.
 21 Q Why weren't you complete?
 22 A Because I didn't -- I didn't -- I wasn't.
 23 Q Well, why did you feel it was important to put
 24 17 -- 1915 hours down after -- at any time?
 25 A That's when I was notified that he was having

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1 any type of medical needs.
 2 Q Why did you feel it was important to put the
 3 time down?
 4 A Because that's what time he notified me.
 5 Q Why did you not feel like it was important to
 6 put down the time you were first notified -- I mean --
 7 that you sent him to the -- to the prison -- I mean, I'm
 8 sorry.
 9 Why did you feel it was not important to put
 10 down the time that you had the escort, escort into the
 11 medical facility?
 12 A Because I didn't believe it was -- I needed to
 13 write the time down. He didn't appear to be in any type
 14 of pain or discomfort, so I -- we just had him escorted
 15 over there.
 16 Q Did you respond to this personally?
 17 A Yes, I did.
 18 Q Did you read Officer -- or not Officer. Did
 19 you read Mr. Williams' statement before you responded to
 20 this?
 21 A Yes, I did.
 22 Q Let's -- let's look at what he says here.
 23 "Please take notice that on September 6, '03, at
 24 approximately 7 o'clock subject was experiencing
 25 repeated heart palpitations. Each palpitation was

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1 increasingly causing excruciating pain. Subject
 2 immediately requested a C/O Roach and C/O Tuntakit to
 3 summons the M.T.A. for medical evaluation due to
 4 excruciating pain in his chest and heart area. C/O
 5 Roach and C/O Tuntakit did not call for medical
 6 assistance until about 1 1/2 hours later, after subject
 7 and his cell-mate repeatedly made numerous requests."
 8 Did you read that?
 9 A Yes, I read that.
 10 Q What was your understanding of Mr. Williams's
 11 description of the problem?
 12 A My understanding was that he did not -- we did
 13 not give him any type of medical -- any type of medical
 14 treatment offered to him.
 15 Q At all, that was -- was his problem that you
 16 did not give him enough treatment at all or medical
 17 treatment at all or that you delayed in giving him
 18 medical treatment? Do we need to read further? Go
 19 ahead and read the whole thing.
 20 A I'll review it.
 21 Q It continues on the third page.
 22 A Okay. To my understanding, it's saying that we
 23 delayed his medical attention.
 24 Q So that would indicate the times would probably
 25 be important; correct?

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1 A That's why -- that's correct.
 2 Q Time would be important. And the amount of
 3 delay or the timing of the request and when he actually
 4 received medical attention would be important facts to
 5 determine if a delay occurred; isn't that right?
 6 MR. McDONOUGH: Objection. Argumentative.
 7 THE WITNESS: I don't know.
 8 BY MR. CALABRO:
 9 Q What do you think would go -- what do you think
 10 are important facts in determining whether a delay
 11 occurred?
 12 A When -- when the correctional officer first
 13 notified medical staff.
 14 Q Is that the only time, is that the only thing
 15 that's important?
 16 A Can you elaborate on that?
 17 Q I mean, if we're determining that the delay
 18 happened, what facts do we need to know to determine if
 19 a delay happened?
 20 A Oh, I see. The time.
 21 Q The time of what?
 22 A The time of the delay.
 23 Q How do you determine the time of the delay?
 24 A By the times that are written down.
 25 Q What times would you need to write down?

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1 A The initial time that -- that -- that it was
2 instigated.
3 Q Is that the only time you'd need to know?
4 A At the time, yes.
5 Q Would you also need to know when he actually
6 got medical assistance?
7 A On the 602 appeal form, I don't think it was
8 important.
9 Q Why not?
10 A Because it's not a report of actual events,
11 it's just a response to his appeal.
12 Q How is one to determine the time of delay when
13 reading the 60- -- your response in the 602?
14 MR. McDONOUGH: Objection. Vague and
15 ambiguous.
16 THE WITNESS: I -- I don't know.
17 BY MR. CALABRO:
18 Q So the issue in this appeal is that there was a
19 delay, there was a -- too long of a delay between the
20 time that he asked for medical assistance and when he
21 actually received medical assistance. Is that your
22 understanding of it?
23 A My understanding is the delay of the time he
24 notified me of his situation and when I notified the
25 medical staff.

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1 Q That's your understanding of it?
2 A Yes.
3 Q Okay. Let's go ahead and read the second
4 paragraph -- or not the second paragraph. On page 3 it
5 says, starting on the fourth para- -- the fourth
6 sentence, fourth line, it says, "C/O Roach and C/O
7 Tuntakit intentionally delayed," you see that?
8 A I see that.
9 Q "C/O Roach and C/O Tuntakit intentionally
10 delayed and interfered with and attempted to deny
11 Subject serious and specialized medical attention.
12 Seeing that Subject was holding his chest and
13 complaining of palpitations and heart pains, C/O Roach
14 and C/O Tuntakit knew that by reason of Subject's
15 incarceration, and locked in his cell, he could not take
16 care for himself. C/O Roach and C/O Tuntakit
17 intentionally delayed in seeking medical care for
18 Subject, stripped Subject of virtually the only means of
19 care available and foreclosed his access to
20 self-protection. By not allowing subject to seek
21 medical attention, C/O Roach call himself punishing
22 Subject because he is on (L.O.P). Thus, C/O Roach and
23 C/O Tuntakit demonstrated deliberated indifference to
24 Subject's serious medical need by intentionally delaying
25 Subject medical care in violation of the Eighth

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1 Amendment."
2 So here he talks about being incarcerated in
3 his cell --
4 A Um-hmm.
5 Q -- that you knew that he was incarcerated in
6 the cell, and that he couldn't get medical attention
7 because he was stuck in his cell. Isn't that what this
8 paragraph is about, or what your understanding of what
9 the paragraph is?
10 A That's what my understanding is, yes.
11 Q So the reason -- what he's complaining about is
12 that he wasn't let out of his cell to get medical
13 attention; right?
14 MR. McDONOUGH: Objection. Vague and
15 ambiguous.
16 THE WITNESS: Yeah, I -- I don't know what his
17 intentions -- what -- what he's trying to say.
18 BY MR. CALABRO:
19 Q Well, what's your understanding of what he's
20 trying to say?
21 A My understanding is that he was delayed in
22 getting medical treatment.
23 Q And the reason he was delayed is because he was
24 stuck in his cell and you and Officer Roach did not let
25 him out?

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1 A I don't know.
2 Q You think that's a fair reading of what this
3 says?
4 MR. McDONOUGH: Objection. Vague and
5 ambiguous.
6 THE WITNESS: It could be.
7 BY MR. CALABRO:
8 Q So it is a fair reading?
9 A It could be.
10 Q So if the delay here was the delay in obtaining
11 medical care, what would be important, then, is deciding
12 when you were first notified that he needed medical care
13 and when he actually received the medical care; isn't
14 that right?
15 A Yes.
16 Q But you didn't provide both of those times, did
17 you?
18 A No, I only provided the time that he notified
19 me.
20 Q Well, you provided a time that you now say was
21 the time that he notified you?
22 MR. McDONOUGH: Objection. Misleading.
23 THE WITNESS: I provided the time that he
24 notified me, yeah.
25 BY MR. CALABRO:

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1 Q Why did you include 1600 hours -- or 1800 hours
2 in this report?
3 A I wrote the 1800 hours because I was -- from
4 reading his appeal, that he was asking for medical
5 assistance an hour, hour and a half before 1915. So I
6 was thinking he was asking me or whoever it was, Officer
7 Roach, approximately 1800 hours that he was seeking
8 medical attention and that we delayed until 1915 hours.
9 Q Where does it say that approximately 1800 hours
10 he was -- he was asking for medical attention?
11 A It doesn't. As I was explaining to you, on the
12 first page, on the -- 1, 2, 3, 4, 5, 6 -- sixth line,
13 where it says, "not call for medical assistance until
14 about 1 1/2 hours later," I was referring from the time
15 that he notified me at 1915 hours, I subtracted the hour
16 and a half from that time. That would have been
17 approximately 1800 hours. That's what I was referring
18 to, that's what I meant.
19 Q Well, he says, his -- his allegation is that he
20 didn't receive medical attention until 8:30, and an hour
21 and a half before, that was 7 o'clock.
22 MR. McDONOUGH: Objection.
23 BY MR. CALABRO:
24 Q You see that, page 3, at 8:30?
25 MR. McDONOUGH: Mischaracterization of the

1 document. We're on page 3 now?
2 BY MR. CALABRO:
3 Q In fact, he alleged at 7 o'clock he was
4 experiencing health -- experiencing repeated heart
5 palpitations, not 6 o'clock; right?
6 A That's correct.
7 Q So you're just saying that the 1600 hours was a
8 mistake on your part?
9 A 1600 hours?
10 Q I mean, 1800 hours, excuse me. I keep thinking
11 6 o'clock. The 1800 hours was a mistake on your part?
12 A Well, what I meant to say is when -- because I
13 was referring to what I understood of his appeal, is
14 that we knew about it for an hour and a half, and that
15 would have been from approximately 7 o'clock time that
16 he told us. So I was -- I was under the impression that
17 he -- we -- we knew about it from -- for an hour before
18 he told me, which would have been approximately 1800
19 hours, 1730 to 1800 hours.
20 Q Why did you include -- if the 17 -- if the 1915
21 hours reference was really about the time that you
22 called the MTA, why didn't you say that you called the
23 MTA at 1915 hours?
24 A I -- I don't know why I didn't.
25 Q I mean, you can agree with me that a fair

1 reading of this is that you notified the immediate- --
2 in the context of Mr. Williams' description of the
3 problem; right? So when he said, "Please take notice
4 that on September 6th, 2003, at approximately 7:00 p.m.,
5 Subject was experiencing repeated heart palpitations,"
6 and then you read your description where it says, "MTA
7 was notified immediately and they notified me they were
8 going to check his file and get back to him" (sic), a
9 fair reading of that would say you notified them at 7
10 o'clock and then reading the next paragraph -- next
11 sentence, it says, "As his pain increased, I notified
12 yard staff to escort him to the MTA office. The time
13 was approximately 1915 hours." So a fair reading of
14 that would be that you notified the MTA immediately at
15 7:00 his pain was increasing, and then at 17 -- or 1915
16 hours, that's when you actually escorted him to the --
17 to the MTA office?
18 MR. McDONOUGH: I'm going to object as vague
19 and ambiguous, and very compound.
20 THE WITNESS: All I know is what I meant to
21 say.
22 BY MR. CALABRO:
23 Q Okay.
24 A And what I meant to say is I knew -- knew of
25 his medical request at 1915 hours, and then when I put

1 1800 hours, I thought he was saying that we knew about
2 it for an hour and a half prior to that.
3 Q So we can agree that you knew about his -- he
4 had at least made a request to see -- start again.
5 We can at least agree that at 1915 hours,
6 Mr. Williams had made a request to you to see -- seek
7 medical attention?
8 A On September 3rd, yes -- or September 6th of
9 2003, yes, he did.
10 Q And let's get a clean record just to make it
11 clear. On September 6th, 2003, you and I both agree
12 that Mr. Williams had made a request to you to seek
13 medical assistance by at least 1915 hours?
14 A That's correct.
15 Q At 1915 hours, was there any reason preventing
16 you from sending Mr. Williams to seek medical attention
17 at that time?
18 A Yes.
19 Q What was that -- what was that reason?
20 A The medical staff wasn't available to see him.
21 Q And you know that because you called the
22 medical staff beforehand?
23 A Yes.
24 Q When did you become aware that there was
25 medical staff at the MTA office?

1 A At 1915 hours.
2 Q Okay. I'm -- the reason that they couldn't see
3 him at the time was because -- why again? I --
4 MR. McDONOUGH: Objection. Speculative.
5 THE WITNESS: I don't know why they couldn't
6 see him at that time.
7 BY MR. CALABRO:
8 Q They said, "Don't bring him"?
9 A Yeah, they said they would check his file and
10 get back to me.
11 Q What if it were an emergency, what would you
12 have done?
13 MR. McDONOUGH: Objection. Speculative,
14 incomplete hypothetical.
15 THE WITNESS: I don't know.
16 BY MR. CALABRO:
17 Q You don't know what you would have done if it
18 was an emergency?
19 A What kind of emergency are we talking about?
20 Q Life-threatening emergency.
21 A I would have activated my alarm.
22 Q Okay. And we can agree that you didn't
23 activate your alarm?
24 A That's correct.
25 Q When you finally sent -- called the yard staff

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1 to escort Mr. Williams to the medical facility, did you
2 have an idea as to whether the medical facility at the
3 time, could see Mr. Williams?
4 A No.
5 Q What was different about the time that you
6 actually escorted -- you had Mr. Williams escorted to
7 the MTA office and the first time that you called the
8 MTA office such that you didn't need to call the MTA
9 office before having him escorted?
10 A Williams told me that his pain was increasing,
11 so I -- to -- just to -- I'm not sure if he was having
12 any type of emergency or not. Just for precautionary
13 reason, I had him taken over there.
14 Q But how did you know the MTA office could see
15 him?
16 A I didn't. I didn't.
17 Q I guess I'm confused why you didn't just send
18 him over the first time for precautionary measures.
19 A Because he didn't say he was in pain.
20 Q He said he was having a hard time breathing.
21 A I have a hard time breathing sometimes too.
22 Q And so you decided that his request wasn't
23 sufficiently severe to send him to the MTA at that time?
24 A No, the medical staff told me that they
25 couldn't see him at that time.

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1 Q You didn't ask them the second time?
2 A The second time, no, I didn't.
3 Q So why -- I'm asking, then, you made a
4 determination the second time, based on your own
5 judgment, that his condition was severe enough that you
6 didn't have to call the MTA office before sending him?
7 A That's correct.
8 Q So we can agree, then, that the first time that
9 he asked for medical assistance, you exercised your own
10 opinion and your own judgment to decide whether you were
11 going to call the MTA office first?
12 A Yes, to call the MTA office, yes.
13 Q And if you -- because if it was sufficiently
14 severe at that time, if you thought his condition was
15 sufficiently severe, you would have just sent him
16 straight to the MTA office with an escort without
17 calling first?
18 A No. I usually would call first, let them know
19 that I'm sending them, what kind of situation it is.
20 Q But you didn't do it the second time?
21 A No, I didn't.
22 Q And I guess I don't understand why.
23 A I don't either. I just -- I just didn't call
24 them.
25 Q And it has nothing to do with the severity --

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1 the difference in the severity of Mr. Williams' pain or
2 your perception of Mr. Williams' pain from the first
3 time he notified you to the second time he notified you?
4 MR. McDONOUGH: Objection. Vague and
5 ambiguous.
6 THE WITNESS: I don't know.
7 BY MR. CALABRO:
8 Q You don't know?
9 A I don't know. I already called them the first
10 time to advise them that he had a -- he had a hard time
11 breathing, so I figured they already knew that -- his
12 situation, they're looking up his medical file, and they
13 already knew what I was sending them.
14 Q Did they call you back?
15 A No.
16 Q Did you ever follow up with them?
17 A No.
18 Q Was that odd, that they didn't call you back?
19 MR. McDONOUGH: Objection. Speculative.
20 THE WITNESS: No.
21 BY MR. CALABRO:
22 Q Since you called them frequently, anytime you
23 send someone over, do they normally say they'll call you
24 back?
25 A No.

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1 Q Have they ever said that they'll call you back?
2 A Not that I can recall.
3 Q This is the only time that they said "I'll call
4 you back"?
5 A Not that I can recall.
6 Q I'm sorry?
7 A Not that I can recall.
8 Q Okay. The question was: This was the only
9 time that you can recall that they've told you that they
10 would call you back?
11 A Not -- not that I can recall. There may have
12 been other times they told me that.
13 Q We can agree you can't remember another time
14 that they told you that they would call you back?
15 A Not in the specific, no.
16 Q Can you recall another time in which the MTA
17 office was covering more than one yard at a time?
18 A Yes.
19 Q Have you ever called the MTA office during one
20 of those times and they told you that they would call
21 you back?
22 A Yes.
23 Q How many times did that happen?
24 A Once, that I can recall.
25 Q And was that Mr. Williams?

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1 A Yes.
2 Q Has there been any other instance in which you
3 have called the MTA office while they've been covering
4 more than one yard and they told you they'd call you
5 back?
6 A Can you repeat that?
7 Q Sure. The reason why Mr. Williams -- so far,
8 my understanding of your story is that when you called
9 the MTA office this time, they told you that they were
10 covering more than one yard?
11 A Yeah.
12 Q And that's why they wanted to know if it was an
13 emergency?
14 A Correct.
15 Q You had determined -- you said it was not an
16 emergency?
17 A Inmate Williams determined it wasn't an
18 emergency.
19 Q And you agreed with him that it wasn't an
20 emergency?
21 A Yes.
22 Q So you used your own judgment, as well, to
23 determine it wasn't an emergency?
24 A That's correct.
25 Q Other than the time -- other than tonight -- or

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1 not tonight, but September 6th, 2003, was there a time
2 that you called the MTA office when they were covering
3 more than one yard?
4 A Not that I could recall.
5 Q You don't remember?
6 A No.
7 Q Okay. Do you know of any other instance, by
8 any other means, in which the MTA office has been
9 covering more than one yard and they said that they
10 would call the guard back?
11 A Not -- not that I recall.
12 Q Is it normally the case, then, that -- well,
13 strike that.
14 So in the past, every time that the MTA office
15 has been covering more than one yard, they've been able
16 to take the patient?
17 MR. McDONOUGH: Objection. Overbroad,
18 speculative.
19 THE WITNESS: I don't -- I don't know.
20 BY MR. CALABRO:
21 Q In your experience?
22 A I -- I don't know.
23 Q I think I already asked that question, never
24 mind. Okay, we'll move on.
25 And again, you don't remember what Officer

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1 Roach was doing at all at this time?
2 A Not -- not exactly, no.
3 Q There's been an allegation that Mr. -- Officer
4 Roach was informed that Mr. Williams was having chest
5 pains by various individuals and that Mr. Roach -- or
6 Officer Roach responded by saying, "Ain't no fucking
7 thing wrong with him. He just want to get out of his
8 cell because he's on L.O.P." Are you aware of that
9 allegation?
10 A I'm aware of that allegation through the
11 paperwork, yeah.
12 Q Have you heard anything from Officer Roach
13 about that allegation?
14 A No.
15 Q Have you heard anything from any other inmates
16 about that allegation?
17 A No.
18 Q Have you heard anything from any of the other
19 officers, correctional officers, about that allegation?
20 A No.
21 Q Do you have any knowledge whatsoever about this
22 allegation?
23 A No.
24 Q And have you heard anything about this
25 allegation other than what's in the court papers?

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1 A No.
 2 Q I'm going to show you what we'll mark as 14.
 3 (Deposition Exhibit 14 marked.)
 4 MR. CALABRO: We decided this one was 13; is
 5 that right? 602 was 13?
 6 MR. McDONOUGH: Yes, that's what I've written
 7 down here.
 8 BY MR. CALABRO:
 9 Q Have you ever seen page 1 of Exhibit 14, the
 10 very front page?
 11 A No.
 12 Q You don't know what that is?
 13 A I don't know what it is.
 14 Q Okay. Have you ever seen the second page of
 15 Exhibit 14?
 16 A No.
 17 Q Do you have any idea what this is?
 18 A No.
 19 Q Have you ever seen what an MTA clinic intake
 20 sheet looks like?
 21 A No.
 22 Q Okay. If I were to tell you this was an MTA
 23 clinic intake sheet that was describing what happened to
 24 Mr. Williams on September 6th of 2003, would you have
 25 any reason to doubt that?

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1 Q My question to you is: Does this refresh your
 2 recollection as to who you remember escorted
 3 Mr. Williams to the MTA clinic on September 6th, 2003?
 4 A No, it doesn't.
 5 Q Do you know of any correctional officer with
 6 the last name of E -- that begins with -- whose last
 7 name begins with E?
 8 A Yes, I do.
 9 Q What are their names -- or how many? Or name
 10 who you remember whose name starts with E.
 11 A Correctional Officer Espinosa. But just to
 12 clarify, I don't know if they were working there at the
 13 time or not.
 14 Q Okay.
 15 A These are just --
 16 Q Can you just -- yeah, just name who you know
 17 who starts with an E.
 18 A That's all I can recall at this time, just
 19 Espinosa.
 20 Q Espinosa?
 21 A Yeah.
 22 Q Do you know if he's ever worked in Building 5?
 23 MR. McDONOUGH: Objection. Vague and
 24 ambiguous.
 25 THE WITNESS: Yeah, I'm not -- he may have.

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1 MR. McDONOUGH: Objection. Lack of foundation.
 2 THE WITNESS: I don't know.
 3 BY MR. CALABRO:
 4 Q Let me refer to the second page. I'm sorry.
 5 Would you have any reason to doubt that this is an MTA
 6 clinic intake page?
 7 MR. McDONOUGH: Objection. Lack of foundation.
 8 THE WITNESS: Yeah, I don't know.
 9 BY MR. CALABRO:
 10 Q You have no reason to doubt that that's true?
 11 A No.
 12 Q If you'll look there, it says, at the top, date
 13 is September 6th, 2003.
 14 A Yes.
 15 Q The time is 2000 hours. You see that?
 16 A Yeah.
 17 Q It says, "Inmate Williams was brought over by
 18 C/O E." Do you see that?
 19 A Um-hmm. Yes.
 20 Q I'm assuming that means Inmate Williams was
 21 brought over by a correctional officer, and either
 22 somebody's last name who starts with an E or
 23 correctional -- correctional officer escort?
 24 MR. McDONOUGH: Objection. Speculative.
 25 BY MR. CALABRO:

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1 BY MR. CALABRO:
 2 Q You just don't know?
 3 A I just don't remember.
 4 Q Do you know if he's ever worked as a yard
 5 officer on Bravo yard, in B yard?
 6 A I believe he has, yes.
 7 Q Is it possible that it was Officer Espinosa who
 8 was his escort on this night, September 6, 2003?
 9 A It's a possibility.
 10 Q The entry time says 8 o'clock here. Is there
 11 any reason to doubt that?
 12 A No.
 13 Q The front sheet is an intake sheet from the
 14 Correctional Treatment Center?
 15 MR. McDONOUGH: Objection. Lack of foundation.
 16 BY MR. CALABRO:
 17 Q Do you -- is that what's -- is that what's
 18 referred to as CTC, Correctional Treatment Center?
 19 A Yeah, that's what's -- yeah, that's what we
 20 refer to it as.
 21 Q If I were to tell you that this was a CTC
 22 intake sheet, would you have any reason to doubt that?
 23 MR. McDONOUGH: Objection. Lack of foundation.
 24 THE WITNESS: I -- yes, I've never seen one
 25 before, so --

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1 BY MR. CALABRO:
2 Q Do you have any specific reason why this would
3 not be a CTC form?
4 A Only because I've never seen it before.
5 Q Okay. If you'll look on the top right-hand
6 corner, it says, date, September 6th, 2003; time in,
7 2150 hours; and time out, 2250 hours. See that?
8 A Um-hmm.
9 Q And this is for Jeff Williams.
10 A Okay.
11 Q Do you have any reason to doubt that
12 Mr. Williams didn't make it to the CTC until 9:50?
13 A I don't know.
14 Q You have no reason to doubt that?
15 MR. McDONOUGH: Objection. Speculative.
16 THE WITNESS: Yeah, I wouldn't know.
17 BY MR. CALABRO:
18 Q I mean, do you have any specific reason to
19 doubt that this actually -- that he didn't -- he didn't
20 make it to the CTC until 9:50?
21 A I would have no reason to doubt it.
22 Q Okay. We're finished with that exhibit.
23 MR. McDONOUGH: Perhaps you can hand those back
24 to her.
25 BY MR. CALABRO:

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1 this lawsuit specifically that describes Mr. Williams'
2 allegations in this lawsuit?
3 MR. McDONOUGH: Objection. Vague and
4 ambiguous.
5 THE WITNESS: Yeah, interrogatories or --
6 BY MR. CALABRO:
7 Q So there's a -- there's a document called a
8 complaint that describes --
9 A Then my answer would be I don't know.
10 Q You don't remember?
11 A Yeah, I don't remember.
12 Q Well, then, let's speak more specifically about
13 your understanding of the allegations of Mr. Williams'
14 complaint. Do you understand that he alleges that he
15 asked for medical treatment from you and Officer Roach?
16 A Yes.
17 Q Do you understand that he claims he was in
18 severe pain at the time that he asked for medical
19 assistance from you?
20 A Yes.
21 Q Do you understand that he claims that you
22 delayed a significant amount of time in responding to
23 that request for medical treatment?
24 A Yes.
25 Q Do you understand that he claims that the pain

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1 Q Have you had a chance to read the complaint in
2 this lawsuit?
3 A Referring to the appeal or --
4 Q No, the actual complaint for this lawsuit.
5 A I can't -- I'm not sure exactly what it is.
6 Q Sure. Does your -- has your attorney explained
7 to you that there is -- that lawsuits are begun with a
8 complaint?
9 MR. McDONOUGH: Objection. Attorney-client
10 privilege.
11 BY MR. CALABRO:
12 Q Do you know what a complaint is?
13 A Yes.
14 Q With regard to a civil litigation?
15 A Yes.
16 Q What is it? What's your understanding of a
17 complaint?
18 A That the inmate was dissatisfied with the way
19 he was treated by a correctional officer at Salinas
20 Valley State Prison.
21 Q Do you know what a -- there's a document in the
22 litigation called a complaint. Do you know what that
23 is?
24 A No.
25 Q Okay. Have you read any documents related to

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1 that he was in was so severe that he thought he was
2 going to die?
3 A No.
4 Q I'm informing you now that that's one of his
5 allegations.
6 A Okay.
7 Q If these allegations were true, I'm not saying
8 that they are, I'm not asking you to admit that they
9 are, but if these allegations were true, do you believe
10 that this would be a violation of Salinas Valley State
11 Prison policy?
12 MR. McDONOUGH: Objection. Calls for a legal
13 opinion, assumes facts not in evidence, and it's
14 ambiguous and misleading.
15 THE WITNESS: I don't know.
16 BY MR. CALABRO:
17 Q Would you agree with me that that would be a
18 bad situation, if an inmate had severe chest pains and
19 the guards delayed a significant amount of time before
20 responding to that pain?
21 MR. McDONOUGH: Objection. Incomplete
22 hypothetical and calls for speculation.
23 THE WITNESS: It could be.
24 BY MR. CALABRO:
25 Q It could be or it would be?

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55 (Pages 217 to 220)

1 A It could be.
2 Q What would be an example of a situation in
3 which that would not be?
4 MR. McDONOUGH: Objection. Calls for
5 speculation.
6 THE WITNESS: I don't know.
7 BY MR. CALABRO:
8 Q So you -- we can agree that you can't think of
9 a situation in which it would be excusable that a guard
10 waited a significant amount of time before responding to
11 an inmate's request for pain -- medical assistance if he
12 was experiencing severe chest pains?
13 MR. McDONOUGH: Objection. Argumentative.
14 THE WITNESS: I can't think of any.
15 BY MR. CALABRO:
16 Q You can't think of any. Would you agree that
17 that kind of behavior, waiting a significant amount of
18 time before responding to severe chest pains, is the
19 kind of behavior that should be discouraged among
20 guards?
21 A Yes.
22 Q Do you think that that's the kind of behavior
23 that should be punished if committed?
24 MR. McDONOUGH: Objection. Ambiguous and
25 vague.

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1 THE WITNESS: Can you clarify what type of
2 behavior you're talking about?
3 BY MR. CALABRO:
4 Q The same exact behavior. So if -- would you
5 agree with me that -- here's -- here's the question.
6 A Okay.
7 Q Do you agree that if a guard waited a
8 significant amount of time before responding to an
9 inmate's chest pains, severe chest pains, do you think
10 that guard should be punished?
11 MR. McDONOUGH: Objection. Incomplete
12 hypothetical, calls for speculation.
13 THE WITNESS: Could be.
14 BY MR. CALABRO:
15 Q Can you give me an example of a time that he
16 shouldn't be?
17 A No.
18 Q So you can't think of an example of when a
19 guard shouldn't be punished if he's waited a significant
20 amount of time, delayed a significant amount of time
21 before responding to a prison inmate's request for
22 medical assistance due to severe chest pains?
23 A No.
24 Q What kind of a punishment do you think would be
25 appropriate for a guard who waited 15 minutes in

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1 response to an inmate's request for medical assistance
2 due to severe chest pains?
3 MR. McDONOUGH: Objection. Incomplete
4 hypothetical, calls for speculation.
5 THE WITNESS: I -- I don't know.
6 BY MR. CALABRO:
7 Q You have no idea?
8 A I have no idea, that's not --
9 Q If you had to quantify that in dollar terms,
10 what would you say?
11 MR. McDONOUGH: Objection. Incomplete
12 hypothetical, calls for speculation.
13 THE WITNESS: I couldn't say.
14 BY MR. CALABRO:
15 Q Would you agree that there should be a
16 significant amount of money?
17 MR. McDONOUGH: Objection. Incomplete
18 hypothetical, calls for speculation.
19 THE WITNESS: I wouldn't know.
20 BY MR. CALABRO:
21 Q You don't know?
22 A No.
23 Q So as far as you're concerned, it doesn't
24 matter what kind of punishment they should receive?
25 MR. McDONOUGH: Objection. Incomplete

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1 hypothetical, calls for speculation.
2 THE WITNESS: No, I don't know what kind of
3 punishment they should receive.
4 BY MR. CALABRO:
5 Q Do you -- you agree that they should receive
6 some punishment --
7 MR. McDONOUGH: Objection.
8 BY MR. CALABRO:
9 Q -- right? I mean, you said --
10 MR. McDONOUGH: Incomplete hypothetical.
11 Objection. I'm sorry, go ahead, finish your question.
12 BY MR. CALABRO:
13 Q I mean, you already said that you agree that
14 they should have some sort of punishment?
15 MR. McDONOUGH: Objection.
16 BY MR. CALABRO:
17 Q And so I just want to know what kind of
18 punishment you think they should have.
19 MR. McDONOUGH: Objection. Incomplete
20 hypothetical, calls for speculation.
21 THE WITNESS: I don't know.
22 BY MR. CALABRO:
23 Q So you would have no reason with disagreeing if
24 that punishment were a significant punishment?
25 MR. McDONOUGH: Objection. Mischaracterization

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1 of the testimony, incomplete hypothetical, calls for
2 speculation.
3 THE WITNESS: Can you repeat that question for
4 me?
5 BY MR. CALABRO:
6 Q Yeah, if you don't know what the punishment
7 would be -- should be, right, you said you don't know
8 what the punishment should be, then you would have no
9 objection if it was a significant punishment?
10 MR. McDONOUGH: Objection. Argumentative.
11 THE WITNESS: No.
12 MR. McDONOUGH: Misstates the testimony.
13 THE WITNESS: I wouldn't know.
14 BY MR. CALABRO:
15 Q Right, so you would have no reason for saying
16 that a big -- a severe punishment would be wrong?
17 MR. McDONOUGH: Objection. Argumentative.
18 THE WITNESS: It could be right, that's true.
19 BY MR. CALABRO:
20 Q You have no reason for objecting to a severe
21 punishment then?
22 A Yeah, because I wouldn't know.
23 Q In terms of dollar amount, then, would you have
24 any reason to -- objecting to a dollar amount of
25 \$100,000 --

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1 wrong?
2 MR. McDONOUGH: Objection. Incomplete
3 hypothetical, calls for speculation.
4 THE WITNESS: I wouldn't know if it was wrong
5 or right.
6 BY MR. CALABRO:
7 Q So you would not have an objection, then, to
8 it; correct?
9 MR. McDONOUGH: Objection. Incomplete
10 hypothetical, calls for speculation.
11 THE WITNESS: I don't know.
12 BY MR. CALABRO:
13 Q What don't you know? I mean, I'm asking your
14 opinion.
15 A I've never had it happen to me and I've never
16 been in that position.
17 Q Right, so I'm asking you, if you don't know,
18 you don't, obviously, have an objection to it --
19 MR. McDONOUGH: Objection. Incomplete
20 hypothetical --
21 BY MR. CALABRO:
22 Q -- right?
23 MR. McDONOUGH: -- calls for speculation,
24 argumentative.
25 THE WITNESS: I can't elaborate on that. It

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1 MR. McDONOUGH: Objection.
2 BY MR. CALABRO:
3 Q -- for 15 minutes?
4 MR. McDONOUGH: Objection. Objection. It's an
5 incomprehensible question.
6 BY MR. CALABRO:
7 Q Do you understand the question?
8 A Not really. It's not clear.
9 Q So if a guard waited 15 minutes in response to
10 an inmates's request for medical assistance because he
11 was experiencing severe chest pains, the delay was 15
12 minutes, and the guard was punished with a \$100,000
13 fine, you would have no reason for saying that would be
14 a bad punishment?
15 MR. McDONOUGH: Objection. Incomplete
16 hypothetical, calls for speculation.
17 THE WITNESS: I wouldn't know.
18 BY MR. CALABRO:
19 Q So you would have no objection to that
20 punishment?
21 MR. McDONOUGH: Objection. Incomplete
22 hypothetical, calls for speculation.
23 THE WITNESS: I wouldn't know.
24 BY MR. CALABRO:
25 Q So you wouldn't know if that punishment was

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1 never happened to me. I'm not going to elaborate on
2 something I don't know.
3 BY MR. CALABRO:
4 Q I'm asking -- I'm simply asking that you don't
5 know; right? And by you saying you don't know, that
6 means you don't have any reasons for or you don't have
7 any reasons against it; is that right?
8 MR. McDONOUGH: Objection. Objection.
9 Mischaracterization of the evidence, incomplete
10 hypothetical, calls for speculation, and we're at the
11 point where he's asked and answered this question
12 several times.
13 MR. CALABRO: Well, he's not answered. He's --
14 they have been asked several times, but he hasn't
15 answered the question.
16 MR. McDONOUGH: "I do not know" is an
17 appropriate answer and that's his answer, he doesn't
18 know. That's his answer. It appears to me that's his
19 answer. He doesn't know. He doesn't know if he would
20 have an objection to it. He doesn't know, that's his
21 answer. That's what it appears the record says to me,
22 that's his answer. We can't -- that's his answer, "I
23 don't know."
24 MR. CALABRO: That's not the answer to the
25 question I was asking.

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57 (Pages 225 to 228)

1 MR. McDONOUGH: Well, what's the question
2 you're asking?
3 BY MR. CALABRO:
4 Q Do you understand the question I was asking?
5 A Can you repeat that question again?
6 Q Sure, we'll start again. We were talking about
7 punishment for somebody who is -- for example, a guard
8 who's had severe chest pains -- not a guard, an inmate
9 has had severe chest pains, he's asked a guard for
10 medical assistance, that guard has delayed 15 minutes in
11 responding to that request. The guard was then punished
12 with a \$100,000 fine. I'm asking if you would have any
13 reasonable objection to that.
14 MR. McDONOUGH: Objection. Incomplete
15 hypothetical. You are asking the witness to speculate.
16 He can answer the question.
17 THE WITNESS: I don't know.
18 BY MR. CALABRO:
19 Q It seems to me that you either have an
20 objection or you wouldn't have an objection.
21 MR. McDONOUGH: That's your opinion.
22 MR. CALABRO: Are you testifying or are you
23 objecting?
24 MR. McDONOUGH: I'm sorry, go ahead. I'm going
25 to object as ambiguous and vague, incomplete

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1 hypothetical and calls for speculation.
2 BY MR. CALABRO:
3 Q Seems to me you would either have an objection
4 or you wouldn't have an objection.
5 MR. McDONOUGH: No question before the witness.
6 BY MR. CALABRO:
7 Q Isn't that true?
8 A No.
9 Q Explain to me how you can either have an
10 objection -- I mean, what other option is there? Either
11 you have an objection or you don't have an objection.
12 MR. McDONOUGH: Objection. Vague and
13 ambiguous, this is an incomplete hypothetical. You're
14 asking the witness to speculate, lacks foundation. It's
15 incomprehensible.
16 THE WITNESS: I just don't have an opinion one
17 way or the other.
18 BY MR. CALABRO:
19 Q What does it mean to you to have an objection
20 to something?
21 A To believe -- to agree with or not agree with
22 something.
23 Q That's what your definition of objection is?
24 A Objection is to disagree with something.
25 Q Is to disagree with something?

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1 A Yes.
2 Q So your definition of objection is to disagree;
3 right?
4 A Yes.
5 Q So would you have a disagreement with a
6 punishment of \$100,000 levied against a guard who
7 delayed 15 minutes responding to an inmate's request for
8 severe -- for -- for medical attention for severe chest
9 pains?
10 MR. McDONOUGH: Clearly that question is
11 objectionable because it is an incomplete hypothetical,
12 it calls for speculation. You're asking the witness to
13 speculate on something. And he's answered the question.
14 Those are my objections.
15 THE WITNESS: I don't know.
16 BY MR. CALABRO:
17 Q You don't know if you'd have a disagreement?
18 A No, I don't.
19 Q So you don't know if it would be fair or
20 unfair?
21 A No, I don't.
22 Q So there would be no reason for you to say it
23 shouldn't have happened?
24 MR. McDONOUGH: Objection. Incomplete
25 hypothetical, calls for speculation, lacks foundation.

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1 THE WITNESS: I don't know.
2 BY MR. CALABRO:
3 Q You'd have no reason as to why it shouldn't
4 happen?
5 MR. McDONOUGH: Objection. Vague and
6 ambiguous, incomplete hypothetical, calls for
7 speculation.
8 THE WITNESS: I -- I don't know.
9 BY MR. CALABRO:
10 Q You don't know if you'd have a reason?
11 MR. McDONOUGH: Objection. Ambiguous and
12 vague, incomplete hypothetical, calls for speculation.
13 THE WITNESS: Can you clarify? If I'd have a
14 reason for what?
15 BY MR. CALABRO:
16 Q Okay, what is your reason right now for why
17 someone should not be charged -- fined \$100,000 if they
18 let a prisoner in his cell experience pain for 15
19 minutes while the guard did nothing?
20 MR. McDONOUGH: Objection. That's not --
21 that's a complete mischaracterization of his testimony,
22 it's ambiguous and misleading, it's an incomplete
23 hypothetical and calls for speculation.
24 THE WITNESS: I can't answer that question.
25 BY MR. CALABRO:

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1 Q Because you have no reason?
2 A I have no -- yeah, I have no reason one way or
3 the other.
4 Q So you have no reason that that shouldn't
5 happen?
6 A I have -- no, I have no reason one way or the
7 other.
8 Q And then you have no reason why a guard should
9 be fined more than \$100,000 if he waited 15 minutes
10 while a prisoner was experiencing severe chest pain
11 before responding to his medical request?
12 MR. McDONOUGH: Objection. Incomplete
13 hypothetical, asking the witness to speculate, and it
14 lacks foundation, and it's, at this point, very
15 ambiguous and misleading.
16 THE WITNESS: I don't know if he should be
17 fined more or less than \$100,000.
18 BY MR. CALABRO:
19 Q That wasn't the question. Listen carefully to
20 the question.
21 A Okay.
22 Q You have no reason right now for saying that a
23 guard should not be fined \$100,000 or more for waiting
24 15 minutes in responding to a prisoner's request for
25 medical assistance?

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1 MR. McDONOUGH: Add to my objections on
2 incomplete hypothetical, calls for speculation,
3 extremely ambiguous question.
4 THE WITNESS: I have no reason one way or the
5 other.
6 BY MR. CALABRO:
7 Q How would you describe your relationship with
8 the other guards at Salinas Valley State Prison -- at
9 Salinas Valley State Prison?
10 A Professional relationship.
11 Q Do you have a sense of duty to one another?
12 A Can you -- what do you mean by that?
13 Q Whatever you mean by it. Do you feel a sense
14 of duty to another officer?
15 A I --
16 MR. McDONOUGH: Objection. Ambiguous.
17 THE WITNESS: I'm not sure what you mean by
18 that.
19 BY MR. CALABRO:
20 Q Do you have an understanding of the word
21 "duty"?
22 A Yeah.
23 Q What is your understanding of the word "duty"?
24 A Task that I perform at work.
25 Q Is that your only understanding of the word

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1 "duty"?
2 A Yeah.
3 Q Okay. Do you have an understanding of the word
4 "loyalty"?
5 A Yes.
6 Q Is there a sense of loyalty to one another,
7 other guards at Salinas Valley -- Salinas Valley State
8 Prison?
9 A No, not that I know of.
10 Q With any of the guards that you work with, you
11 don't have any sense of loyalty to them?
12 A Not that I know of, no.
13 Q Is there any sense of brotherhood among the
14 guards at Salinas Valley State Prison?
15 A What do you mean by "brotherhood"?
16 Q Do you have an understanding of the word,
17 "brotherhood"?
18 A Not really, no.
19 Q Do you have an understanding -- were you ever
20 in the military?
21 A No.
22 Q Is there a closeness between guards? Is there
23 some sort of bond between guards at Salinas Valley State
24 Prison?
25 A What type of bond?

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1 MR. McDONOUGH: I'm going to object as
2 ambiguous.
3 BY MR. CALABRO:
4 Q Is there any kind of bond between the guards at
5 Salinas Valley State Prison?
6 A Not that I'm aware of.
7 Q In other words, you don't feel a bond towards
8 any of them?
9 A Yeah.
10 Q Is there a sense of -- if one guard is in
11 trouble, do you feel like you're obligated to help out
12 the other guard?
13 A Depends on the circumstances. Are you talking
14 about if he's getting assaulted by an inmate or --
15 Q Sure.
16 A Yes.
17 Q Why is that?
18 A Because his life is in danger.
19 Q But it makes no difference that he's a prison
20 guard?
21 A No.
22 Q Is there any sense that you need -- you're
23 obligated to help out a prison guard in that situation
24 because if you were in the same situation, you would
25 want him to help you out?

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1 A Yes.
2 Q That does -- that does figure into the
3 obligation?
4 A Yeah. Can I clarify on that?
5 Q Sure, absolutely.
6 A If it was another inmate, as well, with his
7 life in danger, I would do the same for him, and I would
8 hope that maybe another inmate would do the same for me
9 too.
10 Q Would you have the same expectation, that
11 another inmate would help protect you as another guard
12 would help protect you?
13 A I wouldn't expect it because it's not part of
14 their -- their duties.
15 Q Where it is for guards?
16 A Yeah.
17 Q If one of your guards -- if one of your -- if
18 one of the guards that you worked with asked you to
19 break a rule at Salinas Valley State Prison, would you
20 do so?
21 A No.
22 Q Have you ever done so in the past?
23 A Not that I can recall.
24 Q If a fellow guard asked you to lie for any
25 particular reason, would you do that?

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1 word?
2 A No, I've never heard of that.
3 Q Is there a Green Wall at Salinas Valley State
4 Prison?
5 A Not that I'm aware of.
6 Q Are you part of the Green Wall?
7 A No.
8 Q Are you part of any gang like the Green Wall?
9 A I'm not even aware of any kind of gang with the
10 Green Wall, and I'm not part of any kind of gang.
11 Q Do you know if Officer Roach is part of the
12 Green Wall?
13 A Once again, no, but I don't even know if
14 there's a Green Wall and I wouldn't know if he was
15 associated with it or not.
16 Q Has there ever been a conflict between you and
17 Officer Roach?
18 A What type of conflict?
19 Q Any type of conflict.
20 A Not that I can think of.
21 Q Have you guys ever discussed any situation in
22 which he might have had an adverse position to yours?
23 A Not that I can think of, no.
24 Q Is there any reason that you would lie for
25 Officer Roach?

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1 A No.
2 Q Have you done that in the past?
3 A No.
4 Q Have you ever heard of anything called the
5 Green Wall?
6 A I've heard --
7 MR. McDONOUGH: I'm going to object as vague
8 and ambiguous.
9 BY MR. CALABRO:
10 Q What have you heard of it?
11 A I've read articles about a prison gang of
12 correctional officers that may or may not exist.
13 Q What is your understanding of whether they
14 exist?
15 A I've -- I've never seen or heard that they have
16 existed.
17 Q What do you understand -- or what have you
18 heard about the Green Wall?
19 A What I just -- that they're a prison gang of
20 correctional officers.
21 Q Have you heard of any specific things that
22 they've done?
23 A No.
24 Q Have you heard of any particular inmates that
25 they may or may not have terrorized, I guess is a good

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1 A No.
2 Q I want to go through another exhibit.
3 Will this be --
4 MR. McDONOUGH: 15.
5 MR. CALABRO: 15.
6 MR. McDONOUGH: Is that right?
7 THE REPORTER: Yes.
8 MR. CALABRO: Does anyone have a highlighted
9 copy of this?
10 THE REPORTER: I can make another sticker.
11 (Deposition Exhibit 15 marked.)
12 BY MR. CALABRO:
13 Q This is a declaration that you -- well, first
14 of all, do you recognize what this document is?
15 A Yes.
16 Q What is it?
17 A It's a declaration of Michael Tuntakit in
18 support of defendants' motion for summary judgment.
19 Q Have you seen this before?
20 A Yes.
21 Q And is that your signature at the end?
22 A Yes.
23 Q I just want to go through this and see if
24 anything has changed since then. Why don't you take a
25 minute to read what this says.

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1 MR. McDONOUGH: Read it carefully.
2 THE WITNESS: Okay.
3 BY MR. CALABRO:
4 Q Is there any additions or corrections you'd
5 like to make to this?
6 A Yes.
7 Q Well. Let's go ahead and walk through it,
8 then.
9 A Okay.
10 Q "On the evening of September 6th, 2003, at
11 approximately 7 p.m., I was working along with
12 Correctional Officer Roach, in building 5 at Salinas
13 Valley State Prison, in the vicinity of Plaintiff Gerry
14 Williams' cell. Officer Roach ... had just been" --
15 "had just released inmates from the dayroom in building
16 5."
17 MR. McDONOUGH: "Officer Roach and I."
18 BY MR. CALABRO:
19 Q "Officer Roach and I had just released inmates
20 from dayroom in building 5"; is that right?
21 A That's correct.
22 Q And you say, at this time, "Plaintiff called
23 out to us and asked if he could be released from his
24 cell so that he, too, could go to the play room" --
25 "dayroom"; is that right?

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1 A That's correct, but if I could clarify that,
2 where it says, "Plaintiff called out to us," that would
3 be he called out to me, he asked me.
4 Q Why did you put "us" in this declaration?
5 A I don't recall why I put "us." I was just
6 referring to "us" as correctional officers.
7 Q So he called out to you at 7 o'clock asking you
8 to be released?
9 A Yes.
10 Q "Next, Plaintiff told us that he wanted to see
11 a medical technical assistant. He said he was
12 experiencing some pain in his chest." You see that?
13 A Yes.
14 Q Do you see where you said that he was
15 experiencing some pain in his chest?
16 A Yes, I see that.
17 Q Do you understand that you were under oath when
18 you signed this declaration?
19 A Yes.
20 Q Have you had a chance to read over this
21 declaration when you signed it?
22 A Yes, I did.
23 Q You put "pain in his chest" there?
24 A Yeah.
25 Q "He was experiencing pain in his chest"?

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1 A (No audible response.)
2 Q Move on?
3 A Well, at the time, I mean, that's what -- my
4 best recollection, that's what he said to me.
5 Q And so this declaration was done on February
6 9th of 2005?
7 A Yes.
8 Q So that was almost a year and a half, almost
9 two years ago, year and a half ago?
10 A That's correct.
11 Q Are you saying that your recollection is better
12 today than it was a year and a half ago about this
13 incident?
14 A No.
15 Q Was your recollection better on February 9th,
16 2005, than it is today?
17 A I can't say one way or the other. That's just
18 what I recall at the time.
19 Q So at least on February 9th, 2005, you recall
20 the plaintiff told you he was experiencing pain in his
21 chest at that time, 7 o'clock?
22 A At that time, yes.
23 MR. McDONOUGH: Objection. It doesn't say 7
24 clock.
25 BY MR. CALABRO:

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1 Q I'm sorry, my question to you is: At 7
2 o'clock, this says that he was experiencing pain in his
3 chest?
4 MR. McDONOUGH: Objection. Document speaks for
5 itself.
6 THE WITNESS: No, that -- that 7 o'clock is
7 when we were releasing dayroom.
8 BY MR. CALABRO:
9 Q You can agree with me that you have no other
10 time on here?
11 A Besides --
12 MR. CALABRO: Objection.
13 THE WITNESS: Besides down at the bottom,
14 paragraph 8.
15 BY MR. CALABRO:
16 Q Well, with respect to pain in the chest,
17 there's no time associated with that?
18 MR. McDONOUGH: Objection. Document speaks for
19 itself.
20 THE WITNESS: Besides at 7:00 p.m. pertaining
21 to that, that's correct.
22 BY MR. CALABRO:
23 Q So you say that Plaintiff told us that he
24 wanted -- he had -- Plaintiff said that he wanted to see
25 an MTA and that he was experiencing pain in his chest.

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61 (Pages 241 to 244)

1 Then you contacted the MTA on duty by phone to tell the
2 MTA about the plaintiff's symptoms?
3 A Yes.
4 Q So before you contacted the MTA, you knew that
5 the plaintiff was experiencing pain in his chest?
6 MR. McDONOUGH: Objection. Mischaracterizes
7 the statement from the declaration.
8 THE WITNESS: Yeah, what I meant to say is when
9 he told us he was having chest -- he was having
10 difficulty breathing, or chest pain, he asked me to go
11 see the MTA at that time, at 7:15.
12 BY MR. CALABRO:
13 Q I'm sorry, what is your story now?
14 MR. McDONOUGH: Objection.
15 THE WITNESS: At 7:15 --
16 BY MR. CALABRO:
17 Q Um-hmm.
18 A -- Inmate Williams told me he wanted to come
19 out to go see the MTA, because he was having trouble
20 breathing. And I can't recall if he said he had
21 chest -- pain in his chest or not.
22 Q Well, we can at least agree that this says that
23 he had pain in his chest; right?
24 A That's correct.
25 MR. McDONOUGH: It says he said he was

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1 experiencing pain in the chest, that's what it says.
2 MR. CALABRO: Tim, you can't testify.
3 MR. McDONOUGH: I'm not testifying. I'm sorry.
4 Objection.
5 MR. CALABRO: If you have an objection, state
6 the objection, but the speaking objections have got to
7 stop.
8 MR. McDONOUGH: Okay. Objection. Vague and
9 ambiguous and this question is extremely misleading.
10 BY MR. CALABRO:
11 Q So we can agree that it doesn't say what time,
12 here, that you called the MTA?
13 A I don't see it, no.
14 Q But -- and at this time, at least according to
15 this declaration, when you were under oath on February
16 9th of 2005, it said the first time that the plaintiff
17 asked you -- and correct me if I'm wrong --
18 A Okay.
19 Q -- but it says the first time the plaintiff
20 asked to see an MTA, he said that he was experiencing
21 pain in his chest.
22 MR. McDONOUGH: Objection. Vague, ambiguous.
23 THE WITNESS: Well, that's what it says, but he
24 first said, right here, that plaintiff told us that he
25 wanted to see a medical technical assistant and then,

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1 after that, he said he was having pain in his chest,
2 yes.
3 BY MR. CALABRO:
4 Q So are you saying --
5 A Having trouble breathing.
6 Q I'm sorry, have you finished your answer?
7 A Yeah, he -- he claimed that he was having
8 trouble breathing.
9 Q Was this -- so we're looking at paragraph 4.
10 A Okay.
11 Q Does this describe more than one conversation
12 or is it the same conversation?
13 MR. McDONOUGH: Objection. Vague and
14 ambiguous.
15 THE WITNESS: I can't recall if it was one
16 conversation or two conversations.
17 BY MR. CALABRO:
18 Q Well, earlier you testified that you only had
19 two conversations, one before you called the MTA and one
20 before you sent him to the MTA?
21 A That I can recall.
22 MR. McDONOUGH: Objection. Mischaracterization
23 of the evidence, vague and ambiguous.
24 THE WITNESS: Yeah, that I could recall. I
25 could have had more conversations with him between that

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1 time, I just don't recall.
2 BY MR. CALABRO:
3 Q Do you remember what you meant when you wrote
4 this?
5 A Yeah. What I meant to say was the plaintiff
6 told me he wanted to go see the MTAs, it was not a
7 medical emergency.
8 Q The question I'm asking you is: Do you
9 remember what you meant to say with regard to this
10 paragraph if it was more than -- with paragraph 4, was
11 this one or two conversations in paragraph 4?
12 A I believe it was one paragraph.
13 Q One conversation?
14 A One conversation.
15 Q So at this time, before you called the MTA,
16 according to this, you were aware that there was pain in
17 his chest before you called the MTA?
18 MR. McDONOUGH: Objection. Vague and
19 ambiguous.
20 BY MR. CALABRO:
21 Q At least he told you that there was pain in
22 your chest --
23 A Yes.
24 Q -- pain in his chest?
25 A Yeah, he -- he told me he was having difficulty

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1 breathing and he -- I can't recall if he told me he was
2 having pain in his chest at that time or not.
3 Q So when we go back to the chronology of
4 September 6th, 2003, they -- you had testified so far
5 that there were two times that he complained to you of
6 chest -- of needing to see an MTA, one was at 7:15, when
7 he just -- earlier you said he had only complained of
8 trouble breathing, and the other time was at 8 o'clock,
9 you said, when he was at -- when he complained of
10 feeling pain. Do you remember -- and correct me at any
11 point if I get this wrong.
12 A The timeline, I can't recall the second time
13 when he was sent to the MTA. It was approximately 40
14 minutes after the first time, 30 to 40 minutes.
15 Q Right. So my questions earlier was that I
16 wanted to know why you had called the MTAs before you
17 sent him the first time, but you didn't call the MTAs
18 when you sent him the second time. And my understanding
19 was -- and correct me if I'm wrong -- my understanding
20 was you said that the second time he complained of pain,
21 where the first time he did not complain of pain.
22 MR. McDONOUGH: Objection. The question is
23 ambiguous, vague and compound.
24 BY MR. CALABRO:
25 Q Was that your testimony?

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1 A Partial. That was part of the reason I gave.
2 Q What was the other -- what other -- what other
3 reason did you not call the MTA?
4 MR. McDONOUGH: Objection. Vague and
5 ambiguous.
6 THE WITNESS: Because I already called them one
7 time regarding -- regarding his situation.
8 BY MR. CALABRO:
9 Q Right, but you called them at the time and they
10 said that he couldn't -- you said -- your testimony, at
11 least today, was that they couldn't see him because he
12 was -- they were covering more than one yard?
13 A Yeah, they were busy.
14 MR. McDONOUGH: Objection. Vague and
15 ambiguous.
16 BY MR. CALABRO:
17 Q Is that right?
18 A Yeah, they said they were busy, they couldn't
19 see him at that time.
20 Q And you said the reason why they couldn't see
21 him at that time is because they were covering more than
22 one yard?
23 MR. McDONOUGH: Objection. Vague and
24 ambiguous.
25 THE WITNESS: Yeah.

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1 BY MR. CALABRO:
2 Q And so my question to you, then, was, well, how
3 did you know that at 8 o'clock they could see him?
4 A I didn't know.
5 Q And then my question was why did you send him
6 without calling first?
7 MR. McDONOUGH: Objection. Lacking of a
8 question.
9 THE WITNESS: Can you rephrase that? Why --
10 BY MR. CALABRO:
11 Q What I'm trying to understand is why you're
12 being inconsistent, or it seems to me that you're being
13 inconsistent and I'd like you to explain the
14 inconsistency. We have at least two examples of an
15 inmate asking you to go see the MTA, and one time you
16 said that you called the MTA first and the other time
17 you say you didn't call the MTA first. I'm trying to
18 understand why -- what the difference is.
19 MR. McDONOUGH: Objection. Mischaracterization
20 of the testimony, extremely ambiguous and misleading
21 question, incomprehensible.
22 BY MR. CALABRO:
23 Q Do you understand my question?
24 A Yes.
25 Q Okay. Can you explain the difference?

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1 A I don't know. I don't know the difference.
2 Q Is there anything that you can consult that
3 would refresh your recollection as to why you did it one
4 way the first time and a different way the second time?
5 A No.
6 Q Before you called the MTA, did you ask
7 Mr. Williams whether it was an emergency?
8 A Before I called the MTAs the first time? I
9 believe I did ask him, yes.
10 Q Now -- because when I was reading paragraph 5,
11 it seems that the MTAs first asked you if it was an
12 emergency and then you asked plaintiff if it was an
13 emergency.
14 A Well, I don't remember if I asked them during
15 the conversation or if it was prior to calling the MTAs,
16 but I already had that question asked and he answered
17 me, so I was able to respond to the MTAs.
18 Q Where did -- what phone did you use to call the
19 MTAs?
20 A I did --
21 Q Did you use your phone or did you use your
22 two-way radio, or how did you contact the MTAs?
23 A At what time?
24 Q The very first time. The only time; right?
25 You only contacted them once?

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1 A Yeah, okay. At 7:15, I contacted them on the
2 podium phone.
3 Q So were you talking to Mr. Williams while you
4 were on the phone?
5 A No, I was talking to the MTAs.
6 Q But could you talk to him from the podium while
7 he was in his cell?
8 A I could have.
9 Q But you did not?
10 A No.
11 Q So the only way to read this paragraph is if
12 you talked to Mr. Williams first, then you went to the
13 podium and then you went back to Mr. Williams?
14 MR. McDONOUGH: Objection. Argumentative.
15 THE WITNESS: I can't recall exactly how -- how
16 it happened, but that's what I meant, is I already asked
17 Williams if he was having a medical emergency, and he
18 said he wasn't, and that's what I relayed to the MTAs.
19 BY MR. CALABRO:
20 Q I understand that. I'm just asking for the
21 timeline, and I don't think that's clear. I think we
22 have all these conflicting indices, and I'm not
23 understanding what the timeline was.
24 So you first -- plaintiff first asked you that
25 he wanted to speak -- he wanted to see an MTA?

1 A Um-hmm.
2 Q During that conversation, did you ask him if it
3 was an emergency?
4 A I believe so.
5 Q You believe so?
6 A Yes.
7 Q And then you called the MTA?
8 A (No audible response.)
9 Q And they asked "Is it an emergency?"
10 A Correct.
11 Q And you said, "No, but he still wants to see an
12 MTA"?
13 A Correct.
14 Q And they said what?
15 A They said that they couldn't at this time if
16 it's not an emergency because they're busy cross-
17 covering another yard.
18 Q And that they'll call you back?
19 A Yes.
20 Q And then you didn't speak to him again for
21 another 40 minutes?
22 A I can't recall. I'm sure -- I can't recall if
23 I spoke to him or not. I don't know if I was just
24 observing, but I was right there. So I don't remember
25 saying anything to him.

1 Q So it's possible that you could have talked to
2 him and just don't remember?
3 A Correct.
4 Q Let's also talk about this last bit on
5 paragraph 8. Have you read it?
6 A Yeah, I saw it.
7 Q This talks about Mr. Williams asking you to
8 testify in exchange for settling the suit with you.
9 MR. McDONOUGH: Objection. Mischaracterization
10 of the paragraph.
11 BY MR. CALABRO:
12 Q Did you ever talk to Officer Roach about this
13 offer?
14 A No.
15 Q Did you talk to anybody else about that offer?
16 MR. McDONOUGH: Objection. Attorney-client
17 privilege.
18 BY MR. CALABRO:
19 Q Other than your attorney?
20 A No.
21 Q Just a few more questions here. Do you
22 understand -- or not do you understand. Do you know who
23 is paying your legal bills in this case?
24 MR. McDONOUGH: Objection. Attorney-client
25 privilege.

1 Don't answer that question.
2 (Instruction not to answer.)
3 MR. CALABRO: Who is paying his legal bills is
4 attorney-client privilege?
5 MR. McDONOUGH: I think it is. I believe it
6 is.
7 MR. CALABRO: Under what authority?
8 MR. McDONOUGH: Case law.
9 MR. CALABRO: What's the communication?
10 MR. McDONOUGH: My understanding is that who's
11 paying his legal bills is attorney-client privilege.
12 I'm -- I'm telling him not to answer that question.
13 That's my belief. I don't have the exact authority off
14 the top of my head, but that is the privilege we're
15 asserting.
16 MR. CALABRO: Do you understand the reasoning
17 as to why that would be a communication that's
18 privileged?
19 MR. McDONOUGH: Okay, I'm not testifying here,
20 like you said earlier.
21 MR. CALABRO: But I think we need -- we're
22 having a meet-and-confer about this right now.
23 MR. McDONOUGH: Okay.
24 MR. CALABRO: Do you have any understanding as
25 to why that's communication?

1 MR. McDONOUGH: Yeah, I think -- I think that's
2 protected by the attorney-client privilege, yes.
3 MR. CALABRO: What part of it is the
4 communication?
5 MR. McDONOUGH: I think who is paying his legal
6 bills is. I'm directing him -- he's not going to answer
7 that question. If you want to take it up with the
8 judge, we can do that whenever.
9 MR. CALABRO: I'm just trying to have a
10 meaningful meet-and-confer with you.
11 MR. McDONOUGH: Honestly, Toji, I believe that
12 that information is attorney-client privilege. That's
13 my understanding of case law. I don't have the exact --
14 MR. CALABRO: I am not asking you -- I'm no
15 longer asking you for the exact case --
16 MR. McDONOUGH: Okay.
17 MR. CALABRO: -- whatever. I'm asking for more
18 of the understanding. My understanding of the
19 attorney-client privilege --
20 MR. McDONOUGH: Okay. Sure.
21 MR. CALABRO: -- is that what's protected is
22 the communication; right? So just because he has a
23 document and he gives it to his attorney, the document
24 is not privileged just because he gave it to his
25 attorney.

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1 question. I understand if you want to, you know, file a
2 motion, and we can argue about it later, I understand
3 that, but that's my understanding.
4 MR. CALABRO: Okay.
5 MR. McDONOUGH: Okay.
6 BY MR. CALABRO:
7 Q Do you know what indemnification means?
8 A Not exactly.
9 MR. McDONOUGH: Objection. Vague and
10 ambiguous.
11 BY MR. CALABRO:
12 Q You don't exactly or you don't know at all?
13 A I don't know.
14 Q Do you have any understanding of what
15 indemnification is?
16 A No.
17 Q When you -- it's my understanding that you
18 drove up here and stayed the night in San Francisco --
19 A Yes.
20 Q -- last night? Did you stay at a hotel?
21 A Yes.
22 Q Who paid for that?
23 A I did.
24 Q Are you going to be reimbursed for that?
25 A As far as I know.

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1 MR. McDONOUGH: Correct. Well, maybe, I'm
2 not --
3 MR. CALABRO: The only thing -- the only thing
4 that's actually privileged is any kind of
5 communications. And so I don't understand what the
6 communication is, and I was wondering if you could shed
7 light on that.
8 MR. McDONOUGH: I think that is something that
9 is negotiated through the attorney and the client, so I
10 believe it is -- it is the attorney-client -- I think
11 it's privileged, I think it is.
12 MR. CALABRO: But what's -- I mean, do you --
13 do you understand what I'm asking?
14 MR. McDONOUGH: Okay, I'm not being deposed
15 here, so --
16 MR. CALABRO: No, if you don't know, you don't
17 know.
18 MR. McDONOUGH: This is the way I understand
19 it. You think that -- that whether -- you know, who is
20 paying your attorney's fees is not privileged. I think
21 it is. I think it's communication, I think it's been
22 found -- my understanding of the law is that without --
23 you know, I haven't researched it recently -- is that
24 it's -- it's privileged, and so that's -- and I'm not
25 going to -- I'm going to ask him not to answer that

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1 Q By whom?
2 A I don't know yet.
3 Q I mean, by the State of California?
4 A I'm assuming so, yes.
5 Q If you were to lose this case today -- or not
6 today, but if you were to lose this case and you were
7 ordered to pay money, do you know who would be paying
8 that judgment?
9 MR. McDONOUGH: Objection. Speculative, and
10 incomplete hypothetical.
11 THE WITNESS: No, I don't.
12 BY MR. CALABRO:
13 Q Do you have any agreement with your employer,
14 for example, to pay whatever money judgment you should
15 happen to suffer if you were to lose?
16 MR. McDONOUGH: Objection. Speculative.
17 THE WITNESS: No, I have no idea.
18 BY MR. CALABRO:
19 Q You have no agreement with your employer that
20 you know of?
21 A I don't know, no.
22 Q How did you -- how were you notified that this
23 lawsuit was filed against you?
24 A I believe the litigation coordinator at my work
25 gave me some documents.

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65 (Pages 257 to 260)

1 Q Did you go find a lawyer, then, after that?
 2 A No.
 3 Q Did a lawyer contact you?
 4 A No.
 5 Q How did you have a lawyer represent you in this
 6 case?
 7 A I didn't. I didn't until I talked to the
 8 attorney.
 9 MR. McDONOUGH: Objection. Attorney-client
 10 privilege.
 11 BY MR. CALABRO:
 12 Q Has anybody talked to you about what effect
 13 losing this suit would have on your job?
 14 A No.
 15 Q So you don't know -- for example, if you were
 16 to lose this job, you don't know -- I mean, excuse me,
 17 if you were to lose this case, you don't know if that
 18 means you might get fired or be demoted or anything?
 19 MR. McDONOUGH: Objection. Speculative and
 20 incomplete hypothetical.
 21 THE WITNESS: No, I don't know.
 22 BY MR. CALABRO:
 23 Q You don't know. Well, we talked about a lot of
 24 things today. Is there anything that you felt has been
 25 misconstrued?

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1 A No.
 2 Q Are there any facts that you think are relevant
 3 to this case that I haven't asked you about?
 4 A Yes.
 5 Q What are those facts?
 6 A The fact that when Mr. Williams asked me to go
 7 to the MTA, he didn't appear to be in any type of pain
 8 or say he was in pain.
 9 Q Your testimony is that he didn't appear -- he
 10 didn't say he was in pain?
 11 A He didn't appear to be in pain.
 12 Q Is it also your testimony that he didn't say he
 13 was in pain?
 14 A I can't recall if he said he was in pain, but
 15 he didn't appear to be in pain.
 16 Q Okay. Anything else?
 17 A No.
 18 Q Anything else you want to say that's relevant
 19 to this case?
 20 A Not that -- no.
 21 MR. CALABRO: I'm finished with my questions.
 22 MR. McDONOUGH: Okay. I have no questions.
 23 Perhaps you should just go through the exhibits, make
 24 sure we're on-line with the exhibits.
 25 MR. CALABRO: Sure.

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1 MR. McDONOUGH: We probably can do that off the
 2 record if it's agreeable.
 3 MR. CALABRO: Sure.
 4 THE REPORTER: Did you want a copy of the
 5 transcript?
 6 MR. McDONOUGH: Yes, please.
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 8
 9 I, MICHAEL TUNTAKIT, do hereby declare under
 10 penalty of perjury that I have read the foregoing
 11 transcript; that I have made any corrections as appear
 12 noted, in ink, initialed by me, or attached hereto; that
 13 my testimony as contained herein, as corrected,
 14 is true and correct.
 15 EXECUTED this ____ day of _____,
 16 20____, at _____,
 (City) (State)
 17
 18
 19
 20
 21
 22 MICHAEL TUNTAKIT
 23
 24
 25

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify: That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

DATED: _____

GINA GLANTZ
CSR No. 9795

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