

Exhibit H

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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KELLY GREENFIELD,
Plaintiff,

COPY

vs. No. CV 03-05183 MHP

AMERICA WEST AIRLINES, INC.,
a Corporation; and DOUGLAS
STOLLS, an individual,
Defendants.

_____ /

DEPOSITION OF DOUGLAS STOLLS

VOLUME II

(Pages 250 to 469)

Taken before JANET L. HINCKLEY

CSR No. 5695

July 13, 2004



One Kaiser Plaza, Suite 505
Oakland, California 94612
510/451-1580 Fax 510/451-3797

Certified Shorthand Reporters

14 Q. Do you recall sending any e-mails to America
15 West employees from your dougiestyle e-mail accounts of
16 a sexual nature? It could be a joke, a comment, a
17 cartoon.

18 A. I can recall one e-mail that was sent, but I
19 don't recall what computer or what e-mail account it
20 would have been sent from.

21 Q. What e-mail was that?

22 A. I was saying I don't recall which one it was
23 from.

24 Q. I'm sorry. What was the context of the e-mail,
25 the substance?

1 A. I think it was actually a link to a Web site.

2 Q. What was the Web site?

3 A. I don't know the name of the Web site.

4 Q. What was the substance of the Web site when you
5 hit the link?

6 A. I don't know what the substance of the Web site
7 was, but the link was a video clip of a little chubby
8 boy doing a rap that was kind of obscene. Excuse me,
9 not obscene, vulgar.

10 Q. You mean like a musical rap, like singing?

11 A. Correct.

12 Q. And the language of the rap was vulgar; is that
13 what you're saying?

14 A. Correct.

15 Q. Was there anything vulgar, in your opinion,
16 about the drawing of the chubby boy?

17 A. No.

18 Q. It was just the content of his rap?

19 A. Correct.

20 Q. Do you recall what the content of his rap was?

21 A. Some of it was sexual, as far as some curse
22 words. I don't recall what else.

23 Q. Do you recall approximately when you sent this
24 e-mail?

25 A. I don't, no.

1 Q. Do you recall what station you were working at
2 at that time?

3 A. Oakland.

4 Q. Do you recall if it was before or after you got
5 married?

6 A. I don't recall.

7 Q. I'm just trying to pick time frames in your
8 life. Do you recall if it was before or after you got
9 engaged?

10 A. I would probably have to say after that.

11 Q. Don't guess.

12 A. Okay. Then I don't know.

13 Q. Do you recall who you sent that e-mail to?

14 A. Yes, I seem to recall it being sent to Angella.

15 Q. Muhammad?

16 A. Yes.

17 Q. Do you recall if you sent that e-mail to
18 Miss Muhammad before or after Miss Muhammad sent her
19 e-mail to Michael Jackson complaining about you in
20 Exhibit 36? There's a date on there of March 11, 2004.

21 A. I don't recall.

22 Q. Do you recall if Miss Greenfield was an
23 employee at the time you sent that e-mail?

24 A. I know for sure it was after she had left the
25 company.

18 Q. How did she come to request that?

19 A. I was showing another employee the e-mail. I
20 don't recall who that is, unfortunately, or who that
21 was, and she was coming into the room. I paused it,
22 and she wanted to take part in viewing what we were
23 laughing at.

24 Q. Did she know what you were laughing at at that
25 time or just knew you guys were laughing?

1 A. She knew we were watching something on the
2 computer. She didn't know what it was. Before I had
3 shown it to her, I told her that it was vulgar and
4 wanted to make sure it was not something that was going
5 to offend her. So she asked to see it, and as she
6 proceeded to laugh along with us she requested that I
7 forward it to her e-mail address.

1 STATE OF CALIFORNIA)

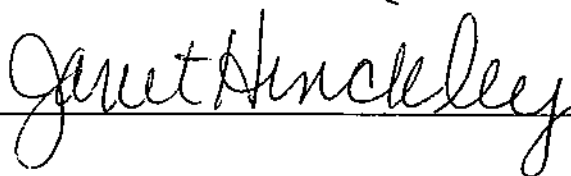
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3 COUNTY OF CONTRA COSTA)

4 I, JANET HINCKLEY, do hereby certify:

5 That DOUGLAS STOLLS, in the foregoing deposition named,
6 was present and by me sworn as a witness in the
7 above-entitled action at the time and place therein
8 specified; that said proceedings were taken before me
9 at said time and place, and were taken down in
10 shorthand by me, a Certified Shorthand Reporter of the
11 State of California, and were thereafter transcribed by
12 computer-aided transcription, and that the foregoing
13 transcript constitutes a full, true and correct report
14 of said proceedings which took place;

15 IN WITNESS WHEREOF, I have hereunder
16 subscribed my hand this 21st day of July, 2004.

17
18
19 A handwritten signature in cursive script, reading "Janet Hinckley", is written over a horizontal line.

20
21 JANET L. HINCKLEY, CSR No. 5695

22 State of California
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