

EXHIBIT U

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 OAKLAND DIVISION

4
5 IN RE NCAA STUDENT-ATHLETE No. 4:09-CV-1967-CW
6 NAME AND LIKENESS LICENSING
7 LITIGATION.

8 _____
9
10 VIDEOTAPED DEPOSITION OF
11 DARIUS ROBINSON
12 MAY CONTAIN CONFIDENTIAL INFORMATION
13 Monday, November 11, 2013

14
15 BE IT REMEMBERED that on Tuesday, November
16 11, 2013, commencing at the hour of 11:37 a.m.
17 thereof, at the James F. Martin Inn, 240 Madren
18 Center Drive, Hospitality Suite, Clemson, SC, before
19 me, Sharon G. Hardoon, CSR, a Certified shorthand
20 Reporter, in and for the State of south Carolina,
21 personally appeared DARIUS ROBINSON, a witness in
22 the above-entitled court and cause who, being by me
23 first duly sworn, was thereupon examined as a
24 witness in said action.

25

Designation Color Key
Blue = NCAA Affirm Desigs.
Orange = Pls' Counter Desigs.
Fuchsia = NCAA Rebuttal Desigs

1 THE WITNESS: I do.

2 EXAMINATION

3 BY MS. MILLER:

4 Q. Good morning, please state your name.

5 A. Darius Robinson.

6 Q. What did you do to get ready for today's
7 deposition?

8 A. Well, you know, I just pretty much -- I
9 knew the time and as far as getting ready, I just,
10 you know, showed up here.

11 Q. Did you meet with counsel before?

12 A. I met with my attorneys the previous night,
13 just, you know, to prepare for the deposition.

14 Q. Is this the first time you've had your
15 deposition taken?

16 A. Yes, ma'am.

17 Q. I'm just going to go over a couple of
18 preliminaries. I'm going to be asking questions,
19 and if you don't understand any of my questions,
20 just ask me to clarify and I can try to rephrase,
21 okay?

22 A. Yes, ma'am.

23 Q. And you're going to have to answer orally
24 or audibly because the court reporter needs to take
25 down your response and so the court reporter can't

1 Q. How are the fans different at college games
2 versus professional games?

3 A. I would say they were more engaged with the
4 players as far as seeing us around and things like
5 that.

6 Q. Why do you think they're more engaged?

7 A. You know, I guess they're just great
8 fans.

9 Q. Do you think that it has to do with the
10 athletes being students at the university?

11 A. I'm not sure.

12 Q. Do you think that having a college football
13 team contributes to the university environment?

14 A. Absolutely.

15 Q. How so?

16 A. As far as just giving the community
17 something to look forward to every weekend.

18 Q. Do you enjoy playing football at college?

19 A. Yes, I do.

20 Q. What do you like most about it?

21 A. Just the opportunity to play with guys that
22 have the same love for the game.

23 Q. So you consider it a privilege to be able
24 to play on that team?

25 A. Yeah, definitely. Definitely.

1 correct?

2 MR. GANKENDORFF: Object to the form.

3 THE WITNESS: Yes.

4 BY MS. MILLER:

5 Q. Are all of your games televised?

6 A. I'm not sure if every single one is
7 televised. I'm not sure if all of them are
8 televised.

9 Q. Do you like having your game televised?

10 A. Of course.

11 Q. Why?

12 A. Just giving more people the opportunity to
13 see us play.

14 Q. And you like that people can watch you
15 play?

16 A. Yes.

17 Q. Do you have family members that watch you
18 play?

19 A. Yes, ma'am.

20 Q. Do you have friends that watch you play?

21 A. Yes, ma'am.

22 Q. Why did you join this lawsuit?

23 A. Well, you know, it was something that I
24 strongly believed in. For the most part, you know,
25 I just felt like a change was needed.

1 Q. What sort of change?

2 A. As far as, you know, just us,

3 student-athletes just being more educated about the

4 whole process.

5 Q. So is education the most important aspect

6 of this?

7 A. Being more educated more so about the

8 process.

9 Q. About students not being paid when you say

10 the process?

11 A. By process I just mean, you know, being

12 aware of what we're getting ourselves into.

13 Q. Do you think student-athletes should be

14 paid?

15 A. You know, I'm not in a position to really,

16 you know, say a student-athletes should get paid.

17 Q. So you would be fine with student-athletes
18 not getting paid as long as they were told going in
19 what the situation was?

20 A. I'm not sure.

21 Q. When you say being educated about the
22 process, what do you mean by that?

23 A. As far as, you know, just me coming in and
24 actually knowing what we're signing.

25 Q. When you say, knowing what you're signing,

<http://www.yeslaw.com/help>

1 you're talking about the forms that you were asked
2 to sign to be eligible to play college athletics?

3 A. Yes, ma'am.

4 Q. Have you read the NCAA rules on college
5 athletics?

6 A. No, ma'am. I have not.

7 Q. Have they been provided to you?

8 A. Yes, ma'am, they have.

9 Q. Is there a reason you didn't read them?

10 A. We pretty much have time frames when it
11 comes to filling out paperwork, so a lot of us tend
12 to just -- we're pretty much obligated to sign the
13 paper so we don't take much time to read them
14 because we have to sign them.

15 Q. But you always had an opportunity to read
16 the rules?

17 A. Yes, ma'am.

18 Q. Do you think that college football players
19 should be paid?

20 A. You know, honestly -- you know, that's for
21 the experts and the people who do the calculations
22 on that. I'm just here, you know, supporting the
23 current players.

24 Q. But you're aware that the plaintiffs in
25 this case are asking for 50 percent of broadcast

Objection
611

1 A. Yes, ma'am.

2 Q. Have you heard the word Amateurism used?

3 A. I've heard of it, yes, ma'am.

4 Q. Amateur athlete, what does that mean to
5 you?

6 A. I assume, you know, an athlete that's
7 playing and not getting paid.

8 Q. Do you think that there is value in having
9 athletes that are college students on the team?

10 A. Can you say that one more time?

11 Q. Do you think there's value to the athletes
12 being college students?

13 A. Yes, absolutely.

14 Q. So you would prefer -- if the options were
15 to have either college students that are also
16 athletes playing for a team or a separate system
17 where you could be playing football not
18 professionally and not attending college which would
19 you choose?

20 A. I don't know.

21 Q. Do you like that you're receiving an
22 education?

23 A. Of course, absolutely.

24 Q. You enrolled in Clemson in 2010, right?

25 A. Yes, ma'am.

1 the field around 4:00 and practice is usually around
2 two, two and-a-half hours on a regular.

3 Q. Is that the same every day?

4 A. Yeah, for the most part. We may have
5 shorter days by 20, 30 minutes, but not a big
6 difference in time.

7 Q. Is there a limit on the number of hours per
8 week that you can play?

9 A. Yes, but I'm not quite sure of the exact
10 number.

11 Q. Have you heard of the 20-hour rule?

12 A. Yes, ma'am, I have.

13 Q. And is that the limit on the number of
14 hours?

15 A. Yes, ma'am. Yes. Since you just reminded
16 me, it's 20 hours.

17 Q. How do you understand that rule?

18 A. You know, pretty much we don't think about
19 it. Our coaches pretty much handle that as far as
20 making sure that we don't go over the 20-hour
21 rule.

22 Q. You do follow that rule?

23 A. Yes, ma'am.

24 Q. Do you know if your travel time to and from
25 games count toward that 20 hours?

1 on my own preparing for games and such stuff like
2 that, of course.

3 Q. So if you were to add that in addition to
4 the time you spend with the time, how much time per
5 week do you think you spend on football?

6 A. 20-hour rule -- maybe around 28 hours. A
7 few hours a day.

8 Q. The 20 hours that you spend with the team
9 and then eight hours --

10 A. Weekly.

11 Q. -- more per week on your own?

12 A. Yes, ma'am.

13 Q. Why do you think the NCAA sets the 20-hour
14 limit?

15 A. I'm not sure.

16 Q. Do you think it's so players can focus on
17 their education?

18 A. I'm not sure.

19 Q. Do you think that education is an important
20 part of being a student-athlete?

21 A. Absolutely.

22 Q. Do you have coaches that emphasize
23 education?

24 A. Yes, ma'am.

25 Q. What do they say?

1 A. They just want to make sure we go to class,
2 and do what we're suppose to do. In order to play,
3 we have to make sure that we keep up with our
4 grades.

5 Q. Do you know what the minimum GPA is?

6 A. No, ma'am, I'm not sure.

7 Q. Have you been academically eligible to play
8 every year?

9 A. Yes, ma'am.

10 Q. So that means you're meeting the GPA
11 requirements?

12 A. Yes, ma'am.

13 Q. How are you doing in classes right now?

14 A. I'm doing well.

15 Q. Are you looking to graduate?

16 A. Yes, ma'am. Absolutely.

17 Q. What's your major?

18 A. Sports management. Here it's called PRTM,
19 but specifically it's sports management.

20 Q. What classes are you taking this
21 semester?

22 A. A couple of AL classes and a couple of PRTM
23 classes.

24 Q. What is AL?

25 A. Athletic Leadership.

1 Q. What's PRTM?

2 A. Parks, Recreation, Tourism Management.

3 Q. And are there mostly athletes in those
4 classes or are there all types of students?

5 A. All types of students as far as the PRTM
6 classes, but the Athletic Leadership are a majority
7 of athletes.

8 Q. Do you have a favorite professor?

9 A. No, ma'am.

10 Q. What do you like most about the classes
11 you're taking this semester?

12 A. We get to engage with our classmates.

13 Q. So you like engaging with classmates that
14 are both athletes and not athletes?

15 A. Absolutely.

16 Q. Do you think having students that aren't
17 athletes contributes to your experience here at
18 college?

19 A. Absolutely.

20 Q. Do you think it's important to graduate?

21 A. Yes, ma'am.

22 Q. Why?

23 A. You know, education. You know, it's
24 important nowadays as far as, you know, getting jobs
25 and things of that sort. You know, a degree is a

<http://www.yourstatebar.org>

1 requirement for most jobs, so in order to get a job,
2 you have to have a degree.

3 Q. You said that you wanted to play college
4 football -- I'm sorry -- professional football. If
5 that doesn't work out, what sort of jobs would you
6 be interested in?

7 A. Probably something in regards to sports.
8 That's what I love.

9 Q. Would that job likely require a college
10 degree?

11 A. Yes, ma'am. Absolutely.

12 Q. How many hours a week on average during the
13 football season do you spend going to class?

14 A. Well, I have maybe two hours a day. I'm a
15 senior, so I don't really have many classes. And my
16 Athletic Leadership classes are online.

17 Q. So you have 10 hours a week going to
18 class?

19 A. To class, physically class, yes. And then
20 we have our academic building where I go to get some
21 of my work done.

22 Q. Is that academic building accessible to all
23 students?

24 A. No, ma'am.

25 Q. Just football players?

1 Q. What would happen if you stopped going to
2 class?

3 A. My grades would probably fall.

4 Q. So you might not be able to play on the
5 team?

6 A. Oh, yeah. I definitely wouldn't be able to
7 play if my grades weren't up to par.

8 Q. Do you have any players on the team that
9 aren't meeting the academic requirements?

10 A. Oh, I'm not sure.

11 Q. How many months of the year is in the
12 football season?

13 A. Around here, it's pretty much year round,
14 12 months.

15 Q. So we talked about what you do to prepare
16 in the fall. How does your spring semester football
17 season compare?

18 A. We pretty much train every weekday of the
19 week as far as that. You know, a lot of us players,
20 we get together and we watch film a lot in our spare
21 time, whenever our schedule permits it. So, you
22 know, pretty much every day of the week we're doing
23 something.

24 Q. Do you enjoy watching film?

25 A. Do I enjoy it, I don't really enjoy it but

<http://www.yourstatebar.org>

1 BY MS. MILLER:

2 Q. So you don't agree with that assessment?

3 A. I'm not sure. I'm an athlete, so I've
4 never seen it from the other side.

5 Q. Has anyone ever taken a test for you?

6 A. No, ma'am.

7 Q. Has anyone ever written a paper for you?

8 A. No, ma'am.

9 Q. To your knowledge, has anyone ever taken a
10 test or written a paper for one of your teammates?

11 A. I'm not sure.

12 Q. Have you ever missed a class due to
13 football?

14 A. No, ma'am. As far as -- unless we was
15 travelling and we had excused absences -- I mean,
16 excused letters for each class.

17 Q. So if you had to miss a class because of
18 football, your coach would have that class absence
19 excused?

20 A. Yes, ma'am.

21 Q. Have you ever missed a class outside of the
22 football season?

23 A. Yes, I missed a class before.

24 Q. Why did you miss that class?

25 A. I either just woke up late, or things

<http://www.yeslaw.com/help>

1 A. Yes, ma'am.

2 Q. What is Death Valley?

3 A. It's the name of our -- well, the name of
4 our stadium is Memorial Stadium, but they call it
5 Death Valley.

6 Q. Again, that lyric is about the school?

7 A. Uh-huh.

8 Q. So you would say that Clemson created the
9 platform for you to rap about?

10 MR. GANKENDORFF: Object to the form.

11 THE WITNESS: I'm not sure.

12 BY MS. MILLER:

13 Q. So if you didn't have Clemson football, you
14 wouldn't have these lyrics.

15 A. Oh, absolutely. Absolutely. If I was to
16 write any other song, you know, it would probably be
17 an issue. So we felt like if we wanted to show our
18 town this is a hobby and we wanted to make a song,
19 the best bet was to make it about Clemson.

20 Q. Do you think people watch your video or
21 listen to the song because they're fans of Clemson
22 football?

23 A. Yes, ma'am.

24 Q. What benefits do you think you received by
25 being a football player at Clemson?

<http://www.yeslaw.com/help>

1 A. Benefits, I don't believe I receive any
2 benefits.

3 Q. Do you have a scholarship?

4 A. Yes, ma'am.

5 Q. Do you consider that a benefit?

6 A. I'm not sure.

7 Q. Are you receiving a free education?

8 A. I mean, I still have to maintain my
9 scholarship. My scholarship is only good for one
10 year, so I have to keep my grades up and maintain or
11 I could lose it.

12 Q. If you do maintain the scholarship, you're
13 given money to attend classes?

14 A. It's earned. I wouldn't say it's given,
15 but yes, ma'am.

16 Q. How much money do you receive in form of
17 your scholarship?

18 A. I'm not even sure of the exact number.

19 Q. What does the scholarship cover?

20 A. I'm not sure of everything it covers.

21 Q. Does it cover tuition?

22 A. Yes, ma'am.

23 Q. Does it cover books?

24 A. Yes, ma'am.

25 Q. Does it cover your room?

1 A. Yes, ma'am.

2 Q. Does it cover food?

3 A. No, ma'am. Oh, yes, ma'am. Yes, ma'am, it

4 does cover food. I'm off campus, so it's a little

5 different for me.

6 Q. How is it different?

7 A. As far as, we just get a stipend and we
8 pretty much control -- we have to manage it on our
9 own.

10 Q. Have you received a scholarship every year
11 that you've been at Clemson?

12 A. Yes, ma'am.

13 Q. Do you know what the tuition is at Clemson?

14 A. No, ma'am.

15 Q. But you know that you don't have to pay any
16 of it?

17 A. No, ma'am.

18 Q. Do you know what it costs for room and
19 board?

20 A. Don't know.

21 Q. You live off campus?

22 A. Uh-huh.

23 Q. Do you pay for your housing?

24 A. The university does.

25 Q. So you never see that bill?

1 Q. Where do you eat your other meals?

2 A. At my home.

3 Q. Was this the same all four years that
4 you've been at Clemson?

5 A. My freshman year, I was on campus. But
6 every single year after that, I was eating at
7 home.

8 Q. Apart from that one dinner that you
9 mentioned, are there any other special meals
10 prepared for football players?

11 A. Well, Monday, Tuesday and Wednesday, we get
12 dinner. Thursday, we get only breakfast.

13 Q. Is generally that dinner after you finish
14 practice?

15 A. Yes, ma'am.

16 Q. And then the breakfast is before you go
17 into practice?

18 A. We get a breakfast just one day, Thursday
19 morning.

20 Q. Why breakfast on Thursday?

21 A. I'm not sure.

22 Q. Where are those meals served?

23 A. At the stadium.

24 Q. So thinking about all your meals, both
25 those ones that are provided by the university and

611b

1 come out of your stipend and the other times that

2 you spend money on food, does your scholarship cover

3 all of those meals?

4 A. Sometimes I have to call home.

5 Q. When you say "call home," you mean ask your

6 parents for additional money for food?

7 A. Yes, ma'am. Yes, ma'am.

8 Q. How much in a semester do you think that
9 you spend on food that is not covered by your
10 scholarship?

11 A. I'm not sure of the amount.

12 Q. If you had to estimate would it be closer
13 to \$100 or \$1,000?

14 A. I'm not sure, like I said, of the exact
15 amount.

16 Q. And is the reason that you need more money
17 for food or to cover food expenses because you eat
18 at nicer places?

19 A. Well, you know, as far as you know living,
20 we have other things outside of just eating. You
21 know, we have things as far as personal hygiene.
22 Some of us have vehicles, so, you know, we need to
23 get around. We need to get to practice, of course.
24 So we have other things other than eating that money
25 has to go to sometimes.

611b

1 So, you know, I just took tutoring in order
2 to get my hours because it was just mandatory for
3 us.

4 Q. Is it a student tutor?

5 A. Is it a student?

6 Q. Yes. Who does the tutoring?

7 A. A student does the tutoring.

8 Q. Is there any academic counseling in
9 addition to --

10 A. Yes, ma'am.

11 Q. How often would you meet with your academic
12 counselor?

13 A. Well, back then it would be a couple times
14 a week.

15 Q. Has that been helpful to you?

16 A. Yes, ma'am.

17 Q. Who would you meet with?

18 A. Well, you know, I got Wayne Coffman, who's
19 my academic advisor. You know, if I needed any
20 additional help, I just went to pretty much the
21 person that was designated to me at the time, which
22 was Brad -- I believe it was Anderson. But that was
23 back my freshman year. I had to take it as a
24 sophomore too. I haven't been in to him since.

25 Q. You said his name is Brad?

1 A. I believe his last name is Anderson. I
2 can't really recall his last name. I just called
3 him Brad.

4 Q. Has that been an important resource for you
5 at your time at Clemson?

6 A. I definitely feel like it helped me.

7 Q. Do you know whether you can register for
8 classes earlier than other students?

9 A. Yes, ma'am, we do.

10 Q. Why do you think that is?

11 MR. COCHRAN: Object to the form.

12 THE WITNESS: I'm not sure.

13 BY MS. MILLER:

14 Q. Do you think it's so you can make your
15 football -- or schedule classes around your football
16 schedule?

17 MR. COCHRAN: Same objection.

18 THE WITNESS: I'm not sure.

19 BY MS. MILLER:

20 Q. Do you think that you have an opportunity
21 to take the classes you want to take because you're
22 able to register earlier?

23 A. I'm not sure.

24 Q. Do you think that that's a benefit to be
25 able to have early registration?

<http://www.secd.uscourts.gov>

1 A. Absolutely. First choice on anything is
2 always good, right?

3 Q. Sure.

4 Are there any other resources you can think
5 of for student-athletes?

6 A. No, ma'am.

7 Q. Who are your coaches at Clemson?

8 A. Who? Oh, our position coach is Mike Reed,
9 Head Coach, of course, is Dabo Swinney. Defense
10 coordinator is Brent Venables, and I have several
11 other coaches on the opposite side of the ball that
12 coach offense, so I don't particularly work with
13 them.

14 Q. Do you like your coaches on a personal
15 level?

16 A. Yes, ma'am.

17 Q. Do they provide you instruction both on and
18 off the field?

19 A. Absolutely.

20 Q. Do you consider that mentors?

21 A. I wouldn't say they're mentors, but if I
22 ever needed them they're always there.

23 Q. What sort of things have you learned from
24 your football coaches?

25 A. You mean as far as -- just wisdom. You

1 know they've been there. Whatever they can drop in
2 your buckets, you know, we tend to take it with
3 us.

4 Q. Are there lessons you've learned on the
5 football field that you think will help you all
6 through your life?

7 A. Absolutely.

8 Q. Can you give examples?

9 A. You know, losing a game, you're on the
10 field, you got to keep going.

11 Q. How would that help you in your life after
12 football?

13 A. Well, you know, you're always going to get
14 bumps in the road. It's not always going to be
15 smooth, so, you know.

16 Q. Was the coaching staff a reason you decided
17 to go to Clemson?

18 A. No, ma'am.

19 Q. Why did you decide to go to Clemson?

20 A. Because I felt like I had the best
21 opportunity to play right away without red shirting.
22 You know, just being able to perform, have a chance
23 to start.

24 Q. Was that something they told during
25 recruitment, that they needed somebody as a corner?

1 officially on the staff.

2 Q. Do you think you have too many coaches?

3 A. No, ma'am, not at all.

4 Q. How much money do you think the athletic
5 training you received is worth?

6 A. I'm not sure.

7 Q. But you think of this as a benefit, your
8 athletic training?

9 A. You said do I feel like it's a benefit as
10 far as does it benefit me?

11 Q. Yes.

12 A. Oh, yes, ma'am. Absolutely.

13 Q. If you didn't receive this athletic
14 training in college would you be able to play at the
15 NFL level?

16 A. Yeah, of course. There's plenty of routes
17 you can take as far as getting yourself prepared.
18 It all depends on what you want.

19 Q. What are the other routes you can take?

20 A. You can always hire someone to train you.
21 Like I said, it all depends on your personal
22 agenda.

23 Q. Would you receive the same training in
24 terms of strategy if you didn't play collegiate
25 football?

1 and I just couldn't feel my ankle anymore.

2 Q. And what type of fracture was it?

3 A. I'm not sure exactly what type of fracture.
4 I just know they told me it was fractured.

5 Q. What was the recovery process like?

6 A. I had surgery a few days later. I was on
7 crutches for a few months. It was pretty intense,
8 but it wasn't anything, you know, really, really
9 serious or anything hard.

10 Q. Did the university pay for your surgery?

11 A. Yes, ma'am.

12 Q. Did the university pay for any medications
13 you received?

14 A. Yes, ma'am.

15 Q. Did the university pay for your
16 rehabilitation?

17 A. Yes, ma'am.

18 Q. Do you think that you received top medical
19 treatment?

20 A. You know, I'm not really familiar with the
21 medical field, so I guess it was good.

22 Q. Was it satisfactory in terms of being able
23 to completely rehabilitate your ankle?

24 A. Oh, yes, ma'am. I feel fine.

25 Q. Were there any health-related expenses

1 relating to this injury that were not covered by the
2 university?

3 A. No, ma'am.

4 Q. Do you have any idea the health care costs
5 the university incurred to help you?

6 A. No, ma'am.

7 Q. Did you keep your scholarship during the
8 time that you were not playing due to the injury?

9 A. Yes, ma'am.

10 Q. If you had not been able to fully recover,
11 do you know if you would have kept your scholarship?

12 MR. GANKENDORFF: Object to the
13 form.

14 THE WITNESS: I'm not sure.

15 BY MS. MILLER:

16 Q. Did anyone ever threaten to take away your
17 scholarship while you were injured?

18 A. No, ma'am.

19 Q. Did anyone ever tell you that you would not
20 receive your scholarship if you didn't come back the
21 next year to play?

22 A. No, ma'am.

23 Q. In what facility did you receive your
24 treatment?

25 A. It was in our stadium.

<http://www.ncsds.com/ncsds.htm>

1 saying that they would cover your expenses for
2 attending college?

3 A. Uh-huh.

4 Q. It didn't matter to you if you had gone to,
5 say, a private school that costs more that you would
6 receive more in terms of scholarship?

7 A. As far as Duke compared to Clemson, no, it
8 didn't matter to me.

9 Q. As long as the cost of education were
10 covered, it was the same?

11 A. Right.

12 Q. Did you consider the geographic location?

13 A. Did I consider it, yes, ma'am.

14 Q. You liked Clemson because it was closer to
15 home?

16 A. Uh-huh.

17 Q. Did you consider whether your games would
18 be televised?

19 A. Did I consider it, no, not at the time. I
20 was out of high school. I just wanted to play
21 football.

22 Q. Do you think about it now?

23 A. Oh, yeah.

24 Q. What do you think?

25 A. I'm glad that all our games, for the

1 majority, are on TV. It's more exposure.

2 Q. Do you think that that exposure will help

3 you in getting a job in the NFL?

4 A. Oh, absolutely.

5 Q. How so?

6 A. If you perform when all the eyes are on
7 you, and more people are watching you...

8 Q. Do you think you would have gotten into
9 Clemson if you hadn't been a football player?

10 A. I could have. Academic wise, but -- yeah,
11 I could have.

12 Q. What's your high school GPA?

13 A. It was pretty good. Maybe around -- I
14 don't know. Mid 3s up to 4s, somewhere in that
15 range. I'm not sure.

16 Q. Did you take the SAT?

17 A. Yes, ma'am, I did.

18 Q. Do you remember your score?

19 A. Not at all.

20 Q. Did you ever apply for universities or did
21 you --

22 A. Huh-uh.

23 Q. You were accepted through a formal channel.

24 A. Uh-huh.

25 Q. Did you sign a National Letter of Intent?

611b

1 February, so I assume this is MCA. When I was
2 thinking about MCA and running that business, and I
3 was just reaching out to people and finding out if
4 people were interested.

5 Q. Did anybody respond?

6 A. I'm pretty sure someone did at the time.

7 Q. How many people?

8 A. I don't know. I can't even recall. Like I
9 said, that didn't really get started.

10 Q. How many followers did you have on Twitter
11 at this time?

12 A. I'm not sure.

13 Q. You're aware that you can continue to work
14 with --

15 MS. MILLER: Strike that.

16 BY MS. MILLER:

17 Q. If you will, could you turn to Robinson
18 001477?

19 A. 1477. I think I tweet too much. 1477.

20 Q. The second tweet from the bottom, can you
21 read that?

22 A. "My wife will have a college degree.
23 Finish school ladies. Ain't nothing better than a
24 woman with accomplishments."

25 Q. What do you mean by this?

1 A. If you can finish through college, it's
2 just an accomplishment. College isn't easy. So
3 it's not even really pointing towards, you know,
4 just school. Just everything that we go through
5 here in college, I just feel like, if you can finish
6 it, then that tells a lot about you.

7 Q. So you're proud that you're going to be
8 able to graduate college?

9 A. Yes, ma'am, absolutely.

10 (DFT. EXH. 1055, Darius Entrepreneur
11 Robinson, Facebook, was marked for identification.)

12 BY MS. MILLER:

13 Q. I'm handing you what's been marked Exhibit
14 1055.

15 A. Am I allowed to keep this? This is
16 funny.

17 Q. I'll give you a separate copy.

18 A. All right.

19 Q. These were all materials that were produced
20 on your behalf. What is this?

21 A. This is my Facebook. Well, it's the Like
22 Page.

23 Q. So you have two Facebook pages, correct?

24 A. Yes, ma'am.

25 Q. What's the difference between the two?

1 A. Absolutely.

2 Q. If you could, turn to about the fourth page
3 in at Robinson 001548.

4 A. 001548.

5 Q. The bottom right post, can you read that?

6 A. The bottom right post: "My last semester
7 here at Clemson has been a special one so far,
8 embracing every moment of it, unforgettable moments
9 and several life lessons. They all are well
10 appreciated...but it's not over yet. Just
11 thinking."

12 Q. What do you mean by this?

13 A. I mean, it's my last semester here. The
14 last one is always special. I've been having a
15 pretty good, you know, season so far. It's been --
16 everything has been going well. I learned a lot. I
17 grew up here. Like I said, I was a child when I
18 first got here. So, you know, basically that's what
19 I'm talking about.

20 Q. Can you think of any examples of life
21 lessons that you've learned while at Clemson?

22 A. I learned that it's about relationships and
23 not what you know. It's about who you know. Both.
24 What you know. That's the biggest one.

25 Q. What sort of relationships have you

1 established while at Clemson?

2 A. You know, just relationships with knowing

3 how to talk to people, knowing how to -- you know,

4 to help people as far as -- you know, it's about

5 impacting people. If you can't help someone --

6 people tend to not want to be involved with you if

7 you can't help them. So it's about what you bring

8 to the table. You know, like I said, who you know,

9 who's going to give you an opportunity.

10 Q. Do you want to help others?

11 A. Absolutely.

12 Q. Do you care about how -- the other students
13 at your school?

14 A. Do I care about the other students, yeah, I
15 care about them.

16 Q. Do you care about players in non-revenue
17 sports?

18 A. Yes, ma'am, I care about everyone.

19 Q. If you could turn to Robinson 001553, the
20 top right post. It's dated August 18th. It says:
21 "People nowadays are more interested in how you can
22 help them opposed to how they can help you. It's
23 just the world we live in." What do you mean by
24 this?

25 A. Exactly what I just said. You know, if you

1 CERTIFICATE OF REPORTER

2 SOUTH CAROLINA:

3 GREENVILLE COUNTY:

4

5 I hereby certify that the foregoing
6 deposition was reported, as stated in the
7 caption, and the questions and answers thereto
8 were reduced to the written page under my
9 direction; that the foregoing pages represent a
10 true and correct transcript of the evidence
11 given. I further certify that I am not in any
12 way financially interested in the result of said
13 case.

14 Pursuant to Rules and Regulations, I make the
15 following disclosure:

16 I am a South Carolina Certified Court
17 Reporter. I am here as an independent contractor
18 for Huseby, Inc.

19 I was contracted by the offices of Huseby,
20 Inc. to provide court reporting services for this
21 deposition. I will not be taking this deposition
22 under any contract.

23 I have no written contract to provide
24 reporting services with any party to the case,
25 any counsel in the case, or any reporter or

1 reporting agency from whom a referral might have
2 been made to cover this deposition. I will
3 charge my usual and customary rates to all
4 parties in the case.

5 This, the 14th day of November 2013.

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Sharon G. Hardoon
Court Reporter, Notary Public
My commission expires:
April 7, 2018

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