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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

MAUREEN TOFFOLONI, as Administrator)
and Personal Representative of the)
ESTATE OF NANCY E. BENOIT,)

Plaintiff,)

vs.)

Case No. 1:08-cv-00421-TWT

LFP PUBLISHING GROUP, LLC, d/b/a)
Hustler Magazine, et al.,)

Defendants.)

DEPOSITION OF TYLER DOWNEY
TAKEN ON BEHALF OF THE DEFENDANTS
APRIL 21, 2011

Charles W. Motter, CCR

Reporter: Charles Motter
Job #: 38091

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1 THE VIDEOGRAPHER: Thank you. 01:47:03
2 Will the court reporter please swear the 01:47:03
3 witness and we will proceed. 01:47:05
4 IT IS HEREBY STIPULATED AND AGREED, by and 01:47:06
5 between counsel for the Plaintiff and counsel for the 01:47:06
6 Defendants, that the deposition of TYLER DOWNEY may be 01:47:06
7 taken in shorthand by Charles W. Motter, RDR, CRR, a 01:47:06
8 Certified Court Reporter, and afterwards transcribed into 01:47:06
9 typewriting; and the signature of the witness is expressly 01:47:06
10 reserved. 01:47:06
11 * * * * * 01:47:06
12 TYLER DOWNEY, 01:47:06
13 of lawful age, produced, sworn, and examined on behalf of 01:47:06
14 the Defendants, deposes and says: 01:47:06
15 EXAMINATION 01:47:07
16 QUESTIONS BY MR. BAUER: 01:47:07
17 Q. Mr. Downey, my name is Derek Bauer and I am a 01:47:20
18 lawyer for LFP Publishing Group, which does business as 01:47:23
19 Hustler Magazine, as you know. 01:47:28
20 Thank you for making yourself available for 01:47:31
21 this deposition. Your testimony is being preserved here 01:47:32
22 for the benefit of the jury. 01:47:37
23 I want to note that we are taking this 01:47:40
24 remotely, to accommodate all parties' request to keep 01:47:42
25

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1 On graduation, I went to the University of 01:48:55
2 Missouri. Was a history major. I attended school there 01:48:56
3 for about 3 1/2 years. I did not graduate. I wrote for 01:49:00
4 the school newspaper, The Maneater, there. I wrote an 01:49:06
5 entertainment column. 01:49:11
6 And kind of decided to move to Los Angeles and 01:49:12
7 try and make it as a screenwriter or -- 01:49:16
8 To be honest, I wanted to write for Hustler, 01:49:18
9 so that's kind of why -- why I moved out there. 01:49:20
10 I was out there maybe 4 years, 5 years, doing 01:49:24
11 odd jobs. I worked at a tanning salon. I did mortgage 01:49:28
12 refinancing. You know, basically what people do out in L.A. 01:49:32
13 when they're trying to write or act. 01:49:36
14 And then Hustler had an opening for editorial 01:49:39
15 assistant, so I forwarded my resume and writing samples and 01:49:43
16 got the job. 01:49:49
17 Q. Why were you interested in writing for Hustler 01:49:52
18 Magazine? 01:49:53
19 A. I liked Hustler Magazine because I liked the 01:49:57
20 politics of the magazine. I liked the First Amendment kind 01:50:00
21 of rights of the magazine. Larry Flynt -- just the idea of 01:50:03
22 writing for Hustler Magazine. It just seemed like 01:50:11
23 someplace where I could -- where I belonged. 01:50:14
24 Q. And once you began working for Hustler 01:50:19
25

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1 expenses down and minimize travel of counsel, so please 01:47:46
2 forgive us any technological -- technological awkwardness 01:47:51
3 that this format may result in, but we'll do our best and 01:47:57
4 appreciate your patience. 01:48:01
5 A. Not a problem. 01:48:03
6 Q. Please go ahead and introduce yourself to the 01:48:05
7 jury. 01:48:07
8 A. My name is Tyler Downey. I was editorial 01:48:08
9 assistant for Hustler Magazine from February 2006 to 01:48:13
10 February 2008. 01:48:18
11 Q. And where do you presently live and work, 01:48:21
12 Mr. Downey? 01:48:23
13 A. I live in Kansas City, Missouri, and I work as 01:48:24
14 a freelance writer and I stay at home with my six-month-old 01:48:27
15 daughter. 01:48:33
16 Q. Are you married? 01:48:34
17 A. I am married, yes. 01:48:34
18 Q. And could you tell the jury briefly about your 01:48:37
19 education and professional background, obviously up till 01:48:40
20 what you described as your employment by Hustler Magazine 01:48:44
21 starting in February of 2006? 01:48:47
22 A. Sure. 01:48:49
23 Born and raised, Joplin, Missouri. Went to 01:48:50
24 Joplin High School. 01:48:53
25

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1 Magazine, what did you do for them? 01:50:21
2 A. I was editorial assistant. It's kind of a 01:50:23
3 catch-all phrase or catch-all job description. 01:50:26
4 I was -- I acted as Bruce David's, the 01:50:29
5 editorial director, his assistant. 01:50:34
6 I was in charge of all of the 2257, which is 01:50:36
7 like the adult recording requirements that the government 01:50:40
8 says. So for the magazine, I would compile all of those 01:50:45
9 and give them to the compliance department, and I was kind 01:50:48
10 of like the liaison between the compliance department and 01:50:52
11 the magazine. 01:50:55
12 And then, you know, I had general duties of 01:50:57
13 making sure the magazine got published on time, meeting 01:50:59
14 deadlines, you know. 01:51:03
15 I was not intimately involved with every 01:51:05
16 aspect of the magazine, but I was -- I was involved with 01:51:07
17 most of the things that went on with the magazine. 01:51:10
18 I helped all the editors, I helped all the 01:51:13
19 production -- production team, that kind of stuff. 01:51:16
20 Q. Did your job responsibilities include taking 01:51:19
21 photographs of nude models? 01:51:22
22 A. No. No, no. I never took photos of nude 01:51:24
23 models. I never was on set of a photo shoot. I never did 01:51:28
24 anything like that. 01:51:32
25

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1 Now, I did have -- I worked freelance. I did 01:51:33
2 the Girls of MySpace section for the magazine, so I did 01:51:35
3 procure nude photographs for the magazine, but I was never 01:51:39
4 on set. I never operated a camera or lighting or anything 01:51:43
5 like that. 01:51:46
6 Q. What about writing articles? 01:51:47
7 A. I -- as -- in a freelance capacity, yes, I 01:51:50
8 wrote articles. 01:51:53
9 Q. Mr. Downey, when and why did you leave the 01:51:55
10 employ of Hustler Magazine? 01:51:58
11 A. Well, there's a lot of -- a lot of reasons I 01:52:02
12 left. 01:52:04
13 (a) my girlfriend at the time had moved back 01:52:05
14 to Missouri. She wanted to be close to family. We wanted 01:52:07
15 to -- you know, we wanted to start a family. We didn't 01:52:13
16 want to do it in Los Angeles. It was too expensive. 01:52:16
17 And then I got in a -- I got in an argument 01:52:18
18 with Bruce David, some personality conflicts, so it was 01:52:22
19 probably time for me to leave. I was kind of burnt out 01:52:28
20 working there. It's a high-stress job. 01:52:31
21 So, you know -- 01:52:36
22 Q. Why -- 01:52:37
23 A. Oh, I'm sorry. 01:52:38
24 Q. No, no. Please continue. 01:52:39
25

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1 cool if we could do this quality of reporting." 01:53:54
2 Newsweek and Time, you know, Bruce David would 01:53:59
3 read those and say, you know, "These news stories are what 01:54:02
4 we need to be reporting on too." 01:54:06
5 Q. How about gossip and entertainment news 01:54:10
6 websites? 01:54:12
7 A. Yeah. Like -- well, like TMZ. TMZ was 01:54:12
8 something. 01:54:18
9 We had a lot of celebrity stuff in here with 01:54:18
10 the Nip Slips, with the Bits & Pieces section. It's kind 01:54:20
11 of celebrity geared. 01:54:25
12 In Touch. 01:54:26
13 Those kind of magazines. 01:54:27
14 Q. Was pursuing celebrity and entertainment news 01:54:31
15 articles a strategic focus of the magazine while you were 01:54:33
16 working there? 01:54:35
17 A. Yeah. We had an editor -- or yes. Sorry. 01:54:37
18 We had an editor, Keith Valcourt. Like I 01:54:40
19 said, his Bits & Pieces section. The Nip Slips section. 01:54:43
20 We would have celebrity interviews, we would 01:54:48
21 have celebrity news. 01:54:50
22 The celebrity stuff was good because it makes 01:54:54
23 a good cover line on the cover of the magazine. People 01:54:56
24 were interested in that. 01:54:59
25

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1 A. You know, Bruce and I, he had written an 01:52:41
2 e-mail and it upset me, and so, you know, I just -- I guess 01:52:43
3 like a lot of employees, I -- I didn't feel appreciated. I 01:52:49
4 knew I did -- I contributed a lot to that magazine, and, 01:52:52
5 you know, it was just time to go. 01:52:56
6 Q. While you were employed at Hustler, what kinds 01:52:59
7 of magazines and media outlets did Hustler view as its 01:53:01
8 competition? 01:53:06
9 A. Its main competition -- 01:53:07
10 And you got to understand that there's 01:53:11
11 different people that view different things in the building 01:53:12
12 as -- as the competition. 01:53:14
13 You know, some people viewed Playboy as the 01:53:15
14 main competition. Playboy. Penthouse. 01:53:18
15 You know, and then there was also like the -- 01:53:23
16 the lower-quality pornographic magazines that really didn't 01:53:25
17 have any reporting in them. 01:53:28
18 Celebrity magazines were definitely considered 01:53:33
19 something that we competed with. 01:53:36
20 News magazines. You know, most people don't 01:53:39
21 realize it but there's -- there's a lot of news articles, 01:53:41
22 like really political articles, in Hustler Magazine. So, 01:53:42
23 you know, Rolling Stone has great political coverage, so, 01:53:48
24 you know, I personally was like, "Man, it would be really 01:53:51
25

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1 Q. Were those regular features of Hustler 01:55:03
2 content? 01:55:06
3 A. Yeah, Bits & Pieces and Nip Slips is a 01:55:06
4 monthly -- monthly standard, so it's in the magazine every 01:55:09
5 single issue. 01:55:13
6 We tried to get as much celebrity -- 01:55:14
7 Q. How -- 01:55:15
8 A. I'm sorry. We tried to get as much celebrity 01:55:15
9 stuff in the magazine as we could, to be honest with you. 01:55:17
10 Q. And why is that? 01:55:22
11 A. Well, honestly, because people have like an 01:55:26
12 insatiable appetite for celebrity gossip, it seems like. 01:55:31
13 I don't know any numbers or anything like 01:55:35
14 that, but I honestly -- I think the only magazines that are 01:55:36
15 really profitable right now are those gossip magazines. 01:55:39
16 You know, I know that the adult magazines are 01:55:42
17 hurting, newspapers are obviously hurting, so it seems like 01:55:44
18 the celebrity stuff is kind of what you have to do if you 01:55:48
19 want to stay competitive. 01:55:51
20 Q. How did Hustler Magazine keep up with what 01:55:54
21 kind of celebrity and entertainment news reporting its 01:55:56
22 competitors were doing? 01:55:59
23 A. Well, Keith Valcourt, I know he's got like 01:56:02
24 deals with Mr. Skin on celebrity nudity for the Nip Slips 01:56:06
25

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1 and movies. 01:56:13
2 We have like a section, "Oh, you know, the 01:56:14
3 stars of True Blood have been nude in these movies before." 01:56:17
4 We would show the interviews. It was just the individual 01:56:19
5 reporter's contacts. 01:56:24
6 And then people come to Hustler, too, which is 01:56:27
7 kind of like this. 01:56:31
8 Q. Did people on Hustler's editorial staff 01:56:34
9 actually monitor what competitors were reporting in the 01:56:37
10 celebrity news genre? 01:56:39
11 A. Yeah. Yeah. I mean, you pretty much have to 01:56:42
12 for the Bits & Pieces section, I think. And for also 01:56:44
13 the -- 01:56:47
14 There's two, like, parody ads in the magazine, 01:56:49
15 one of which is always like a political and then one of 01:56:55
16 which is kind of an entertainment. 01:56:57
17 Once again, this is Keith Valcourt, so, you 01:56:59
18 know, when he's doing the -- the parodies, he kind of 01:57:02
19 parodies off of what's in the celebrity news a lot of 01:57:07
20 times. 01:57:09
21 Q. Was it part of your job responsibilities to 01:57:12
22 monitor what celebrity entertainment news media was 01:57:14
23 reporting? 01:57:16
24 A. I don't know if it was -- you know, it wasn't 01:57:20
25

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1 contained in this document as competitors of Hustler 01:58:38
2 Magazine for entertainment and celebrity news content? 01:58:41
3 A. Yeah. You've got TMZ in here, which -- I 01:58:44
4 mean, if you're talking about celebrity kind of gossip and 01:58:49
5 kind of the salacious stuff -- is probably Number 1. 01:58:53
6 Gawker, I would go to -- or not Gawker, but 01:58:56
7 Defamer. While I was working there, I would go to Defamer 01:58:59
8 probably at least a couple times a week and look at it. 01:59:04
9 What are some of the others? 01:59:09
10 You know, it is kind of funny. Some of these 01:59:11
11 were actually -- I recognize a lot of these because they've 01:59:13
12 been in Bits & Pieces before. A lot of these Nip Slips, 01:59:15
13 it's the exact same stuff that was in Hustler magazine. 01:59:20
14 Q. Is it fair to say you recognize the sources 01:59:27
15 reflected in this exhibit as outlets that you and others 01:59:28
16 working for Hustler Magazine, while you were there, 01:59:32
17 regularly followed and monitored as Hustler's competitors 01:59:34
18 for such content? 01:59:39
19 A. I would say that's accurate, yeah. 01:59:42
20 Some more than others. Some people -- I mean, 01:59:45
21 there's people in the -- there were people in the building 01:59:49
22 that couldn't care less about celebrity news, but, you 01:59:50
23 know, the people that were writing the stories and that 01:59:52
24 kind of stuff, yeah. They definitely followed TMZ. 01:59:56
25

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1 like -- nobody ever said, "Go to TMZ and monitor this," but 01:57:22
2 it's something that I did on my own just to stay informed. 01:57:26
3 I did that for political sites, celebrity 01:57:29
4 sites, news sites, porn sites, adult sites, adult 01:57:32
5 publications. 01:57:38
6 You know, anything that was related to the 01:57:39
7 magazine, I tried to stay up on, just because I felt it 01:57:41
8 would make me better at my job. 01:57:44
9 Q. Mr. Downey, hopefully delivered to you today 01:57:48
10 by Federal Express was a document that I'll represent to 01:57:51
11 you was a compendium that was put together of entertainment 01:57:56
12 and celebrity news reports from 2006 through 2008 that 01:58:02
13 included celebrity images that were -- 01:58:07
14 A. Right. 01:58:08
15 Q. -- gathered from a variety of gossip and 01:58:09
16 entertainment news publications and websites. 01:58:11
17 Were you able to receive that document? 01:58:16
18 A. Yeah. I've got it in front of me. 01:58:17
19 Q. And have you had an opportunity to review it? 01:58:20
20 A. I have. 01:58:22
21 Q. When you reviewed this document -- and I'll 01:58:25
22 ask the court reporter, actually, to mark it as Exhibit 1 01:58:29
23 to your deposition while you're looking through it -- did 01:58:31
24 you recognize the sources for the news articles that are 01:58:35
25

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1 I mean, people follow TMZ with -- with or 02:00:01
2 without Hustler as a competitor. You know what I mean? 02:00:04
3 I mean, people -- people just follow these 02:00:07
4 sites just because they're interested in celebrity gossip, 02:00:08
5 too. 02:00:11
6 Q. In your opinion, is the content contained in 02:00:14
7 that exhibit typical of entertainment and celebrity news 02:00:17
8 articles being published by Hustler's competitors when you 02:00:20
9 worked there? 02:00:24
10 A. Yes. 02:00:25
11 Q. And do you recall that the editors of Hustler 02:00:32
12 Magazine, including yourself, were aware of this content 02:00:34
13 while you were employed there? 02:00:36
14 A. Absolutely. You know, a lot of these things, 02:00:38
15 it's kind of interesting -- and I don't -- I don't know how 02:00:41
16 we talk about specific ones on here, but we received a lot 02:00:46
17 of this stuff -- like the Colin Farrell sex tape was kind 02:00:54
18 of shopped around. You know, a lot of this stuff was 02:00:58
19 shopped around. 02:01:01
20 Some I think we wrote about, some we didn't 02:01:05
21 write about, but a lot of -- I would not be surprised if a 02:01:08
22 lot of these images were actually in the Bits & Pieces. 02:01:13
23 And I guarantee you a lot of these images were probably in 02:01:14
24 the -- the Nip Slips section of the magazine. 02:01:19
25

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1 Q. Thank you. That's all I have on that exhibit, 02:01:26
2 so you can set it aside -- 02:01:28
3 A. Okay. 02:01:31
4 Q. -- unless you have additional comments. 02:01:33
5 A. Well, I would say -- I would say that these 02:01:35
6 websites I don't think had the compliance requirements that 02:01:39
7 we had, so a lot of this stuff like that Colin Farrell sex 02:01:41
8 tape I was telling you about, you know, I think that we 02:01:45
9 decided not to pursue that for legal reasons. 02:01:48
10 Some of these -- you know, like these videos, 02:01:54
11 we didn't get the go-ahead to run, which kind of makes this 02:01:59
12 one that we did that we're talking about in this case a 02:02:03
13 little bit different because, you know, this -- these 02:02:05
14 things were celebrity news just for celebrity news' sake, 02:02:11
15 you know, and I like to think that the -- the Benoit piece 02:02:15
16 was a news -- it was more of a features instead of a Bits & 02:02:19
17 Pieces article. 02:02:21
18 Q. Well, I'll ask you more about that -- 02:02:24
19 A. Okay. 02:02:26
20 Q. -- in a minute, but let's start from the 02:02:26
21 beginning with respect to that article, and let me ask you: 02:02:30
22 You were the author of that news article about Nancy Benoit 02:02:34
23 and the images of her that were published in the March 2008 02:02:37
24 issue of Hustler Magazine? 02:02:40
25

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1 is that -- that wrestler, his wife." 02:03:56
2 And since it was more of a news story instead 02:04:05
3 of just a celebrity Nip Slip, you know, he -- he gave it to 02:04:07
4 me. If it was just a celebrity kind of everyday Nip Slip, 02:04:10
5 kind of like that, it would have been probably put on hold 02:04:12
6 until Keith Valcourt got back. 02:04:15
7 But since this was like a, "Oh, this will be a 02:04:17
8 good -- this will be a good story, we don't want to lose 02:04:19
9 this, you handle it," that's how I came to work on it. 02:04:21
10 Q. So what was Hustler Magazine's interest in the 02:04:26
11 story? 02:04:28
12 A. She, at the time -- 02:04:33
13 You know, and I don't -- I'm trying to 02:04:35
14 remember exactly when Mr. Samansky called and when it 02:04:37
15 related to her death, but, I mean it was really big in the 02:04:41
16 news. You know, this was a big, big story. It was a 02:04:46
17 national story. 02:04:49
18 I imagine -- at least I -- I understood 02:04:52
19 that -- I imagine that a lot of Hustler subscribers are 02:04:55
20 wrestling fans, so I think the idea was, this would be the 02:04:59
21 exact kind of story that Hustler would be interested in 02:05:04
22 publishing. 02:05:07
23 Q. Was the information that Mr. Samansky gave you 02:05:10
24 exclusive? 02:05:14
25

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1 A. Yes, I was. 02:02:42
2 Q. And please tell the jury how it was that you 02:02:44
3 came to write that article for Hustler Magazine. 02:02:46
4 A. Sure. 02:02:50
5 I -- actually I think it was mostly by 02:02:53
6 accident, because as the editorial assistant, you know, 02:02:55
7 calls that came into the magazine department -- the 02:02:59
8 magazine, I answered, and the photographer, the guy that 02:03:02
9 possessed the videotape, Mark Samansky, called into 02:03:07
10 Hustler, I answered it, and he mentioned what he had, and 02:03:11
11 said, you know, "Would you guys be interested in this?" 02:03:15
12 Now, usually this kind of thing would, like I 02:03:18
13 said, go to Keith Valcourt, and I think that Keith Valcourt 02:03:21
14 was out on vacation when this happened. 02:03:24
15 And so I -- I took it to Bruce David. I said, 02:03:28
16 "Here's a -- here's a guy that says he has screen grabs of 02:03:31
17 this" -- 02:03:36
18 You know, and I wasn't -- I knew who she was 02:03:37
19 but I wasn't a really big follower of wrestling or anything 02:03:39
20 like that. I knew who she was because of the -- because of 02:03:42
21 the -- of the murder, to be honest with you. I probably 02:03:46
22 wouldn't know who she was if it wasn't for that. A lot of 02:03:49
23 other people did, but I didn't. 02:03:52
24 So I went to Bruce and I said, "You know, this 02:03:54
25

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1 In other words, did any other magazine or 02:05:15
2 media outlet have that story? 02:05:16
3 A. No. No. You know, and that's the -- 02:05:18
4 Q. And how did you obtain -- 02:05:22
5 A. Oh, I'm sorry. 02:05:23
6 Q. No, no. 02:05:24
7 A. I was going to say, you know, a lot of times 02:05:25
8 that's why these people come to Hustler, because there's a 02:05:27
9 lot of stories that Hustler will -- will go with that, you 02:05:31
10 know, maybe other places won't. 02:05:36
11 You know, that's kind of like Larry Flynt's -- 02:05:40
12 Larry -- you know, Larry Flynt doesn't bow down to 02:05:42
13 advertisers or that kind of thing, so Hustler has always 02:05:44
14 kind of prided itself on publishing stories that other 02:05:50
15 people won't publish. 02:05:52
16 Now, I think people would have been interested 02:05:54
17 in this story, no matter what, but I think that's why he 02:05:57
18 came to us and I think that's why he offered us the 02:05:59
19 exclusive. 02:06:02
20 Q. How did you obtain the information that you 02:06:04
21 used to write the article? 02:06:07
22 A. I interviewed him over the phone. We arranged 02:06:10
23 the sale of the -- 02:06:14
24 Q. Was that -- 02:06:15
25

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1 A. We arranged the sale of the photographs -- 02:06:16
2 Q. Was that -- 02:06:18
3 A. Excuse me? 02:06:19
4 Q. I'm sorry. The time lag does create -- 02:06:20
5 A. Yeah. 02:06:23
6 Q. -- a little bit of a technological difficulty, 02:06:23
7 but my question was: Was it a substantial interview that 02:06:25
8 you conducted with Mr. Samansky? 02:06:28
9 A. It was probably 45 minutes to an hour, I'd 02:06:30
10 say. Half an hour to an hour. Something like that. 02:06:31
11 Q. And how much -- 02:06:37
12 A. It wasn't -- 02:06:37
13 Q. -- did Hustler Magazine -- 02:06:38
14 Go ahead. 02:06:40
15 A. It wasn't -- it wasn't a very -- I mean, I 02:06:41
16 didn't -- I wasn't really interested in Mark Samansky's 02:06:43
17 history of what he was doing, you know. 02:06:46
18 I pretty much asked him how did the -- how did 02:06:47
19 the screen grabs come into existence, how did you know her, 02:06:50
20 what was your relationship with her, and I asked her what 02:06:52
21 was she -- I asked him what she was like. 02:06:56
22 You know, that's what I was looking for. 02:06:59
23 Q. And how much did Hustler Magazine pay for the 02:07:03
24 images and the information obtained from Mr. Samansky? 02:07:06
25

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1 They're not even really photographs. They're -- they're 02:08:18
2 screen grabs from a VHS tape. 02:08:21
3 Hustler's pictorials, I mean, you can -- you 02:08:24
4 can see those are done by world-class photographers with 02:08:28
5 lighting, makeup, hair. They're professionally produced 02:08:34
6 images. 02:08:39
7 So in that regard, there's really no 02:08:42
8 comparison between the images of the article and the images 02:08:43
9 in like a typical Hustler pictorial. 02:08:48
10 Now, the Bits & Pieces images, usually those 02:08:50
11 are paparazzi photographs. Once again, professional 02:08:53
12 photographers. So much better quality. Much better 02:08:58
13 quality than -- than the article. 02:09:02
14 The Nip Slips or the -- the Movie Mammaries is 02:09:06
15 what it's called when they run -- now, those are screen 02:09:09
16 grabs, you know. If you say, "Oh, she appeared topless in 02:09:12
17 this," then they'll grab a screen -- then they'll take a 02:09:14
18 screen grab from the movie. 02:09:17
19 So those are kind of comparable. They're not 02:09:19
20 quite as old as these. Excuse me. But either one -- 02:09:21
21 either one you're talking about, there -- the images in the 02:09:27
22 article are -- I mean, they're not images that would be in 02:09:29
23 the magazine if it wasn't for the article. 02:09:33
24 Q. How did the payment to Mr. Samansky compare to 02:09:40
25

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1 A. Thousand dollars. 02:07:10
2 Q. How did the quality of the images acquired 02:07:13
3 impact the amount Hustler Magazine was willing to pay for 02:07:17
4 them, if -- if it did at all? 02:07:19
5 A. I don't know. I don't know. 02:07:26
6 I showed the photos to Bruce David, who took 02:07:26
7 them, I believe, to Larry -- I don't know if -- actually, I 02:07:31
8 don't know if he took them to Larry Flynt or not, but that 02:07:33
9 was the number that was come -- that came back to me. I 02:07:36
10 didn't come up with that thousand dollar number. That was 02:07:40
11 a number that was told to me. 02:07:43
12 Q. How would you -- how would you describe the 02:07:45
13 quality of the images acquired from Mr. Samansky compared 02:07:47
14 to the typical quality of celebrity images published in 02:07:51
15 Hustler Magazine? 02:07:54
16 A. Okay. When you say "the typical images," are 02:07:56
17 you talking about the typical images in like a pictorial or 02:07:58
18 the typical celebrity images in the Nip Slips or the Bits & 02:08:01
19 Pieces section? 02:08:05
20 Q. Well, how did the images compare to both of 02:08:08
21 those categories? 02:08:09
22 A. Okay. 02:08:10
23 The images are -- if you've seen them, they're 02:08:11
24 pretty substandard. They're 30-year-old screen grabs. 02:08:15
25

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1 other payments that you're aware of that Hustler Magazine 02:09:42
2 made for celebrity images and information in other articles 02:09:45
3 or aspects of the publication? 02:09:48
4 A. Once again, not really my area of expertise 02:09:52
5 with the celebrity stuff. I'm trying to think of other 02:09:56
6 celebrity... 02:10:05
7 I'll be honest. I -- this is the only article 02:10:10
8 that I really did anything with celebrities, by -- 02:10:12
9 Well, no. Actually that's not true because I 02:10:16
10 did -- I did do the Obama Girl. I did an Obama Girl 02:10:18
11 article, and I think we paid a similar amount of money, 02:10:21
12 around a thousand dollars, for swimsuit photos of her from 02:10:24
13 a photographer. 02:10:28
14 Q. Are you aware of any instance in which Hustler 02:10:31
15 Magazine paid as much as \$10,000 for celebrity images 02:10:33
16 alone? 02:10:37
17 A. No. 02:10:39
18 Well, we had Carmen Electra -- that was before 02:10:41
19 I started working there -- was in the magazine. I imagine 02:10:44
20 they paid quite a bit for that. 02:10:48
21 We had the -- the David Vitter -- the -- the 02:10:52
22 prostitute. She got paid quite a bit of money, I believe, 02:10:57
23 to appear in the magazine, but that wasn't just a 02:11:00
24 pictorial; that was because she was coming out and saying, 02:11:02
25

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1 "I had sex with a U.S. senator." 02:11:05
2 I don't think -- obviously the Nip Slips and 02:11:10
3 the Movie Mammaries, we don't pay those people, but I think 02:11:11
4 Keith Valcourt has an arrangement with Mr. Skin or maybe -- 02:11:15
5 maybe some paparazzi. I don't know. 02:11:22
6 I do know that people have come in with -- 02:11:24
7 with celebrity images asking for a lot of money and they 02:11:26
8 have been denied. They were very disappointed at what we 02:11:30
9 offered them. 02:11:33
10 Q. Based on your publishing experience with 02:11:36
11 Hustler Magazine -- 02:11:39
12 A. Uh-huh. 02:11:39
13 Q. -- is it your opinion that other celebrity and 02:11:42
14 entertainment news outlets would have been interested in 02:11:45
15 the Benoit story, had it been brought to them first? 02:11:47
16 A. I think without a doubt they would have been 02:11:50
17 interested. 02:11:51
18 And I can say that because when our -- the 02:11:53
19 month before this came out, we have a, you know, "coming 02:11:57
20 out next month." When that -- when it became public 02:12:00
21 knowledge that we were going to run this, it was -- it 02:12:03
22 received quite a lot of press. Quite a lot of press. 02:12:06
23 Q. So are you aware of whether other outlets, in 02:12:11
24 fact, did run the Benoit images? 02:12:13
25

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1 price is agreeable. 02:13:25
2 Once all that is taken care of, then it goes 02:13:28
3 to -- you know, we have our discussions with the legal 02:13:30
4 department whether it would -- 02:13:34
5 Q. And we're not going to talk about -- 02:13:36
6 A. Okay. 02:13:38
7 Q. We're not going to talk about what lawyers 02:13:38
8 said to you. 02:13:40
9 A. Right. I'm just going through the process. 02:13:41
10 So that would -- that would be the next step 02:13:43
11 in the process is the -- is the legal situation. 02:13:45
12 And then after that, I did the -- I did the 02:13:49
13 interview and I wrote the -- and I wrote the article and it 02:13:54
14 goes to -- it goes to our editors to design the page and 02:13:57
15 copyright and all that kind of stuff. 02:14:03
16 Q. Was the decision to publish the Benoit article 02:14:06
17 and images in this case the typical process or was there 02:14:09
18 anything extraordinary about it in this particular case? 02:14:12
19 A. Without going too much in depth on the detail, 02:14:18
20 we -- before we ever agreed to purchase the -- the photos, 02:14:22
21 we did the legal issue. 02:14:26
22 Now, on most articles -- most articles like 02:14:30
23 that -- or most -- most articles like this, like the 02:14:32
24 feature articles have already been slated for the magazine, 02:14:36
25

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1 A. I know other websites did. I think they 02:12:16
2 covered up with, you know, like a black graphic over the 02:12:19
3 nipples and maybe the pubic hair. 02:12:24
4 But, yeah, people -- people ran the images and 02:12:25
5 people, you know, quoted the story and, yeah, people 02:12:29
6 reported on it. 02:12:33
7 Q. When you say "people," do you mean People 02:12:35
8 magazine or other entities? 02:12:37
9 A. Oh, I mean other entities. I mean other 02:12:39
10 celebrity -- 02:12:42
11 I know for a fact some of the -- I know for a 02:12:42
12 fact some of the wrestling websites and some of the 02:12:46
13 wrestling publications reported on it. 02:12:48
14 Q. Mr. Downey, how did Hustler Magazine make the 02:12:54
15 decision to publish the Benoit article and images? 02:12:57
16 A. In -- like in -- in an instance like this, 02:13:03
17 there's a lot of things that have to be considered. 02:13:06
18 One, are the photos worthy of being published. 02:13:08
19 Are they good enough. Can you see. So in that regard, we 02:13:10
20 have to look -- we have to see the photos before we buy 02:13:14
21 them. 02:13:17
22 In this instance, it was pretty quickly 02:13:18
23 decided that these would be good for the magazine. 02:13:20
24 Then you have to agree on a price, if the 02:13:23
25

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1 and so when they're done, we send them to the lawyers for 02:14:38
2 approval. 02:14:42
3 In this one, we spoke to them before the 02:14:42
4 article was even laid out, anything like that. 02:14:44
5 So that was a little bit out of the ordinary, 02:14:48
6 at least on my end, on the -- that had never happened in 02:14:49
7 any of the articles I had ever written before. 02:14:53
8 Q. Without getting into advice that Hustler's 02:14:57
9 outside counsel or inside counsel may have given -- 02:15:01
10 A. Uh-huh. 02:15:04
11 Q. -- about this particular article, tell the 02:15:04
12 jury why you and Hustler Magazine believed that the 02:15:09
13 publication of the Benoit images was legal without needing 02:15:12
14 to get permission from her estate. 02:15:15
15 A. Sure. 02:15:18
16 I mean, she was a major -- this was a major 02:15:22
17 news story, and, you know, the simple fact that -- the 02:15:24
18 simple fact that she had been in the news so much was 02:15:32
19 something that really -- you know, was really attractive 02:15:35
20 about the article for us, in that, you know, it's an 02:15:40
21 addition to the current reporting going on with her. So we 02:15:46
22 thought we would be good on that grounds. 02:15:48
23 She was deceased, which, you know, right to 02:15:51
24 privacy and that kind of thing becomes a little bit 02:15:57
25

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1 different once a person is not living anymore. 02:16:01
2 And second of all, you know, 2257, if you -- 02:16:06
3 I'm going to take a look at the images here. 02:16:09
4 (Witness reviews material.) 02:16:14
5 A. You know, my concern -- 02:16:14
6 Without telling what the lawyer said, my 02:16:15
7 concern was, you know, we didn't have IDs on her, to 02:16:18
8 prove she was over 18 at the time, which is what -- you 02:16:22
9 know, with my -- when I was working with the compliance 02:16:26
10 department, you know, I would have to provide IDs to them 02:16:28
11 and there was no way we were going to get IDs with these 02:16:31
12 photos. So that was one of the concerns I had. 02:16:33
13 But if you look at the images, they're mostly 02:16:38
14 topless images. There's some -- there's some pubic hair 02:16:41
15 there, but there's not really any vaginal images, I guess. 02:16:46
16 So the 2257 -- 02:16:53
17 And plus, this was in the '80s, you know, 02:16:55
18 another thing, which there's a time limit on the 2257 and 02:16:57
19 what you have to do. 02:17:00
20 So going in -- before we even spoke to the 02:17:01
21 wrestlers [sic], I felt that we would be standing on pretty 02:17:06
22 solid ground with it. 02:17:09
23 Did I say speaking to the wrestlers? I meant 02:17:11
24 speaking to the lawyers. 02:17:14
25

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1 A. Uh-huh. 02:18:28
2 Q. -- is the cover of the March 2008 issue? 02:18:29
3 A. Yes. 02:18:32
4 Now, when that -- 02:18:33
5 Q. And is -- 02:18:34
6 A. -- when the "coming next" page came out on the 02:18:35
7 previous issue, you know, and we started to get a lot of 02:18:38
8 press, things changed, because Donna Hahner sent out an 02:18:41
9 e-mail saying, "This is a great article, this is going to 02:18:44
10 be a big seller, look at all the press we're getting, you 02:18:47
11 know, this is -- this is the kind of celebrity stuff, the 02:18:52
12 kind of celebrity news that we should try and get more of." 02:18:55
13 Q. And what you were referencing there is the 02:19:00
14 cover of the March 2008 issue and you have in front of you 02:19:02
15 an entire copy of that magazine? 02:19:05
16 A. I do. 02:19:07
17 Q. And is that a true and correct copy of the 02:19:11
18 issue as it was published? 02:19:13
19 A. I'll be honest with you. I haven't taken a 02:19:16
20 look through it, but -- 02:19:17
21 Q. Well, if you don't mind, just take a quick 02:19:20
22 moment -- 02:19:22
23 A. Sure. 02:19:22
24 Q. -- and look through it and tell me if there's 02:19:23
25

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1 Q. For purposes of planning the March 2008 issue, 02:17:19
2 how did Hustler Magazine internally treat or characterize 02:17:22
3 the Benoit article and images? 02:17:26
4 A. For the March issue, it was -- honestly, this 02:17:30
5 may sound surprising, but it was just another article, to 02:17:34
6 be honest with you. 02:17:37
7 It was an article that I was writing, so it 02:17:38
8 was important to me, but it wasn't like the whole staff 02:17:40
9 was, "Oh, we've got Chris Benoit's wife." You know, 02:17:44
10 everybody had their own articles. 02:17:48
11 I mean, you can see even on the -- the exhibit 02:17:51
12 here, the cover of the magazine, that the Barbi twins 02:17:54
13 interview with an animal rights terrorist is above it. 02:17:59
14 Howard Stern's favorite comic, Lisa 02:18:02
15 Lampanelli, is right here (indicating). 02:18:05
16 You know, these are the two -- these are the 02:18:06
17 two important ones, because a lot of times the thing cuts 02:18:09
18 it off right there (indicating) when you've got plastic 02:18:11
19 wrap on it so you can only see the first couple. 02:18:14
20 So I always got the impression that it was 02:18:17
21 just -- it was another article, it was another news article 02:18:21
22 in the magazine. 02:18:23
23 Q. And the document that you were just 02:18:26
24 referencing -- 02:18:28
25

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1 any reason you have to believe that it's not a full copy of 02:19:25
2 the March 2008 issue as it was published. 02:19:28
3 A very quick look. 02:19:32
4 A. Sure. Yeah. 02:19:34
5 (Witness reviews material.) 02:19:35
6 A. It's -- I see absolutely no reason why this 02:19:38
7 would not be the March issue. 02:19:40
8 Yeah, it looks like the issue to me. 02:19:43
9 Q. (By Mr. Bauer) And do you have in front of 02:19:46
10 you what I believe Hustler calls a content and pagination 02:19:47
11 report? 02:19:55
12 A. Yes. Yes. 02:19:56
13 Q. And on the bottom of that report, is there 02:20:03
14 a -- what we call a Bates label indicator "LFP-0134"? 02:20:06
15 A. There is. 02:20:12
16 Q. Do you recognize this document? 02:20:16
17 A. Yes, I do. 02:20:18
18 Q. Can you tell the jury what it is? 02:20:21
19 A. What this was is we used this internally. 02:20:23
20 It's essentially just a layout of the magazine. 02:20:28
21 This one, you can see that it's Version 4, so 02:20:30
22 there were three previous ones before this, as things 02:20:33
23 changed, the layouts changed, the page numbers changed. 02:20:36
24 And what it does is everybody on staff and the 02:20:40
25

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1	production departments and some of the executives, 02:20:47	1	so those are the news stories. You see "Dominican Republic 02:22:06
2	everybody would get every single version of these, and it 02:20:48	2	Sex Resort." You know, that's not a pictorial; that's an 02:22:11
3	was just a quick reference as to where things were in the 02:20:50	3	article on a Dominican Republic sex resort. 02:22:14
4	magazine. And it shows it page by page. 02:20:54	4	Global warming article, Lisa Lampanelli 02:22:18
5	Q. And is this a true and correct of the -- is 02:20:59	5	interview, Nancy Benoit. 02:22:21
6	this a true and correct copy of the March 2008 pagination 02:21:01	6	So that's how that works. 02:22:22
7	report? 02:21:04	7	Q. So how was the Benoit article and images 02:22:28
8	A. It is. 02:21:05	8	characterized for the internal pagination report purpose? 02:22:31
9	Q. And does the report color-code the content of 02:21:10	9	A. Nancy Benoit was a features piece. That is to 02:22:35
10	the magazine? 02:21:14	10	say, a -- 02:22:38
11	A. It does. Every -- every section of the 02:21:16	11	Q. Does that mean it's editorial? 02:22:39
12	magazine -- every different section of the magazine has a 02:21:19	12	A. Editorial. A news -- news and entertainment. 02:22:40
13	different corresponding color. 02:21:22	13	Q. And you've got the full copy of the March 2008 02:22:48
14	So for example, on this, you have ads which 02:21:24	14	Hustler Magazine issue in front of you. 02:22:52
15	are in blue; you've got cartoons which are in yellow; 02:21:27	15	How is the Benoit article treated, both on the 02:22:57
16	you've got the photo sets which are in orange; you've got 02:21:31	16	cover and inside that magazine, with respect to its 02:23:01
17	the purple or dark blue, you'll see like the monthly 02:21:39	17	characterization as "editorial"? 02:23:05
18	standards, the things that are in there every single month, 02:21:45	18	A. Sure. 02:23:07
19	beginning with Sex Parody, Table of Contents, Publisher 02:21:49	19	Well, as you can see here, most of the cover 02:23:09
20	Statement, going all throughout. 02:21:52	20	lines on here are feature pieces: Barbi twins article; 02:23:12
21	On Pages 102, 103, and 104, you will see the 02:21:54	21	Lisa Lampanelli interview; global warming; Chris Benoit. 02:23:17
22	Movie Skin and Nip Slips section, which is -- once again, 02:21:57	22	You know, a lot -- most of the time we would 02:23:23
23	there every section [sic]. 02:22:03	23	put the features' cover lines on the cover, or we would put 02:23:25
24	And then the red -- red/pink are the features, 02:22:03	24	the feature articles on the cover. 02:23:28
25		25	
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1	You know, we obviously say who is on the 02:23:30	1	nothing to do with the article, but I wouldn't -- I would 02:24:33
2	cover, the girl here, Victoria Valmer, but for the most 02:23:31	2	never have had the involvement that I did. 02:24:36
3	part, you know, you've got the features right there. 02:23:35	3	The only involvement I had with the pictorials 02:24:38
4	Now, as far as being treated for the 02:23:38	4	was rounding up the IDs and releases to give to 02:24:40
5	magazine -- 02:23:41	5	compliance at the end. That was my -- the extent of my 02:24:44
6	I mean, you can pretty much see there -- 02:23:42	6	involvement. 02:24:47
7	there's two pages here, so, you know, all of our pictorials 02:23:43	7	The creative director and -- what did we call 02:24:48
8	are six to eight pages. 02:23:47	8	that editor? You know, the creative director and the 02:24:52
9	There's a big block of text, the actual news 02:23:50	9	design -- the design department worked exclusively with 02:24:55
10	article. 02:23:53	10	the -- with the pictorials. 02:24:59
11	I mean, if you were to go through this 02:23:54	11	And the talent department. 02:25:01
12	magazine, it would be very easy to tell the difference 02:23:57	12	Not something I -- not something I would do. 02:25:03
13	between a pictorial and a features article like this. 02:23:59	13	And if it wasn't -- and if it was just a 02:25:06
14	Q. Mr. Downey, would you have been involved in 02:24:05	14	normal -- if it was just a normal celebrity piece, if this 02:25:08
15	the publication of this article and its images if Hustler 02:24:07	15	was like a normal Nip Slips, it would have gone to Keith 02:25:10
16	Magazine had not considered it a news feature? 02:24:12	16	Valcourt. I wouldn't have seen it. 02:25:14
17	A. I didn't -- I didn't understand. 02:24:16	17	Q. Would -- would Hustler have published the 02:25:17
18	Q. Would you have had any involvement in the 02:24:19	18	images of Nancy Benoit without the article you wrote? 02:25:20
19	drafting of this article and the publication of the article 02:24:21	19	A. No, they wouldn't. 02:25:24
20	and the images -- 02:24:24	20	Q. How do you know that? 02:25:28
21	A. I would have -- yeah. 02:24:26	21	A. Well, two things, honestly. 02:25:31
22	Q. -- if Hustler Magazine hadn't treated it as a 02:24:28	22	I honestly don't believe that this -- even 02:25:34
23	news feature? 02:24:31	23	if -- you know, and she was a celebrity in her own right, 02:25:37
24	A. I would have had -- well, I don't want to say 02:24:32	24	but I don't know for sure if we would have published these 02:25:41
25		25	

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1 images if there wasn't the big news story accompanying it 02:25:44
2 of her being murdered. 02:25:47
3 I mean, I'll be honest with you. These 02:25:52
4 images -- the images are special only because they're of 02:25:54
5 her at a certain time in her life. If you're just looking 02:25:59
6 at the images, they're not images that would be in Hustler 02:26:02
7 Magazine on their own. 02:26:05
8 Q. When celebrities are published -- when 02:26:11
9 celebrity images are published in Hustler Magazine that 02:26:15
10 don't have an associated news story like you've just 02:26:17
11 described -- 02:26:19
12 A. Uh-huh. 02:26:19
13 Q. -- where would they be found in Hustler 02:26:20
14 Magazine? 02:26:21
15 A. They would be in Nip Slips, Bits & Pieces, or 02:26:22
16 Movie Mammaries, for the most part. 02:26:27
17 Q. Is there an example of such a story in this 02:26:29
18 March 2008 issue that you can use to contrast the Benoit 02:26:31
19 article? 02:26:35
20 A. Sure. Let me get to my table of contents 02:26:35
21 here. 02:26:44
22 (Witness reviews material.) 02:26:44
23 A. Okay. If you look at 102 and 104 pages -- or 02:26:57
24 102 through 104, Movie Mammaries -- 02:27:03
25

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1 A. Yes. 02:28:18
2 Q. Does Hustler Magazine publish news articles 02:28:20
3 without illustrative images? 02:28:23
4 A. Not that I can recall, no. 02:28:28
5 I mean, pretty much that's one of the most 02:28:30
6 important things. 02:28:33
7 You know, I've had -- when I first started, 02:28:35
8 the features editor was always like -- he always told me, 02:28:36
9 you know, "My first question is, 'What are the images 02:28:39
10 like,' for any article. 'Do you have photos.' That's one 02:28:42
11 of the first questions. 'Do you have photos.' Doesn't 02:28:46
12 matter what the article is." 02:28:50
13 Now, there have been times -- you know, I 02:28:51
14 write -- I write a lot of political stuff for the magazine 02:28:52
15 where, you know, I don't have photos, and if that's the 02:28:54
16 case, then the -- then the staff uses a photo service to 02:28:58
17 buy photos. And that was part of -- you know, I did that 02:29:03
18 some as part of my responsibilities. I would search for 02:29:07
19 photos for articles to accompany -- you know, to accompany 02:29:10
20 the articles. So you're always going to have images in any 02:29:13
21 article. 02:29:16
22 Q. Mr. Downey, do you know who Jim Daus is? 02:29:19
23 A. Jim Daus was Nancy Benoit's first husband. 02:29:23
24 Q. And how do you know of Mr. Daus? 02:29:30
25

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1 Q. (By Mr. Bauer) These are the examples? 02:27:14
2 A. Yeah. 02:27:16
3 You've got Movie Mammaries here. You'll see 02:27:16
4 these are screen grabs. The quality is better than -- than 02:27:18
5 the article, but not -- not substantially better. 02:27:24
6 I mean, a screen grab is always going to look 02:27:27
7 like a screen grab. But these are celebrity screen grabs 02:27:29
8 from movies that they've appeared nude in. 02:27:31
9 Now, here, the Famous Flesh, this one, it's 02:27:33
10 only one page. It looks like a -- Karina Smirnoff from 02:27:37
11 Dancing With The Stars, it looks like a paparazzi shot of 02:27:42
12 her in a towel. 02:27:44
13 That's how -- yeah. That would be a good 02:27:49
14 example of what just a normal celebrity topless section of 02:27:51
15 the magazine would look like. Famous Flesh. 02:27:58
16 Q. Mr. Downey, are news articles and images 02:28:01
17 illustrating news articles typical content in Hustler 02:28:05
18 Magazine? 02:28:07
19 A. Are news articles typical content? 02:28:08
20 Is that what you're asking? 02:28:10
21 Q. Yes. 02:28:11
22 A. Yes. Absolutely. 02:28:12
23 Q. And are images illustrating those news 02:28:13
24 articles typical content? 02:28:17
25

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1 A. I know of Mr. Daus -- I first heard of 02:29:33
2 Mr. Daus with my interview with Mark Samansky. He was 02:29:35
3 discussing -- he was discussing how these photos came to 02:29:39
4 be, and Jim Daus -- Daus' name came up. 02:29:41
5 Q. Have you ever spoken to Mr. Daus? 02:29:46
6 A. I have. I have. 02:29:48
7 He called. Once again, it was when that 02:29:49
8 "coming next" page came out and we were receiving press. 02:29:53
9 He called the Hustler offices. 02:29:56
10 Q. And please describe for the jury the 02:30:00
11 conversation that you had with Mr. Daus. 02:30:03
12 Specifically, what was the purpose of that 02:30:06
13 call? 02:30:07
14 A. Well, he was calling, I think, for a couple 02:30:08
15 reasons. 02:30:10
16 Number one, I think he was concerned because 02:30:12
17 there were actually a few videotapes or two videotapes 02:30:14
18 that -- that existed at one point, and I -- and I didn't 02:30:18
19 realize this at the time. Mark Samansky told me this 02:30:21
20 later. 02:30:24
21 He was asking, "Am I in the magazine? Am I in 02:30:25
22 these images?" 02:30:29
23 And I said, "No. It's just Nancy." 02:30:30
24 And I come -- I came to find out later on that 02:30:34
25

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1 he was -- that there was another videotape that Mark 02:30:36
2 Samansky had taken of Jim Daus and Nancy having sex. 02:30:37
3 You know, I guess they were drunk and -- I 02:30:42
4 don't know. I -- I don't know all the particulars about 02:30:45
5 that videotape, but there -- one existed and he was 02:30:47
6 concerned that that is the one that we were running in 02:30:50
7 Hustler. 02:30:52
8 So when I told him that, "No, you're not in 02:30:53
9 it. No, you know, there's no images of you," he wanted to 02:30:55
10 know if he was entitled to anything. Monetarily, I 02:31:01
11 believe. And I told him no. 02:31:06
12 And then I asked him to hold on and I went and 02:31:11
13 told Bruce David. I'm like, "I've got her ex-husband on 02:31:15
14 the phone and he's asking all these questions." 02:31:18
15 And, you know, Bruce was like, "We don't owe 02:31:24
16 him anything. Just tell him that, you know, the article 02:31:26
17 stands as it is." 02:31:30
18 I suggested to Bruce that, you know, if she 02:31:33
19 had allowed these images to be taken, she wanted to be in 02:31:36
20 Penthouse, maybe her husband had some more, and that I 02:31:40
21 should feel him out to see that. 02:31:45
22 And Bruce agreed and he said, "Feel him out, 02:31:46
23 see what he says." 02:31:49
24 So I came back to the phone and I -- I 02:31:51
25

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1 having sex. 02:33:03
2 When I told him that, you know, he wanted to 02:33:04
3 know if he was entitled to anything and what right did we 02:33:07
4 have. 02:33:10
5 But, no, it wasn't -- he never -- as far as my 02:33:10
6 memory goes, he never said, "I don't want you to publish 02:33:14
7 these." 02:33:16
8 Q. Did he ever demand that Hustler not publish 02:33:18
9 the pictures? 02:33:20
10 A. No, not to my knowledge. 02:33:21
11 Q. Thank you, Mr. -- 02:33:26
12 A. I mean, when we ended our conver-- we ended 02:33:27
13 our conversation -- we ended our conversation, I was 02:33:29
14 thinking he was going to call me back and give me a price 02:33:31
15 for additional images. That's how our conversation ended. 02:33:33
16 MR. BAUER: Thank you very much. We 02:33:40
17 appreciate your time. 02:33:40
18 Mr. Decker is going to have some questions for 02:33:41
19 you. 02:33:43
20 THE WITNESS: Sure. 02:33:44
21 EXAMINATION 02:33:45
22 QUESTIONS BY MR. DECKER: 02:33:46
23 Q. Mr. Downey, as I said earlier, my name is 02:33:46
24 Richard Decker, and I represent Maureen Toffoloni, who is 02:33:48
25

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1 asked -- I told Jim, you know, "If it's monetary 02:31:53
2 compensation you're looking for, we would be very 02:31:56
3 interested in purchasing additional images." 02:31:58
4 And he said that he had -- he had additional 02:32:01
5 images, all that we could ever want, but he would have to 02:32:05
6 think about it before he sold it to us. 02:32:08
7 Q. Did he ask you what right Hustler had to 02:32:12
8 publish the images of Nancy Benoit? 02:32:15
9 A. He did. 02:32:17
10 And I -- I had told him what our internal -- 02:32:18
11 you know, our internal discussions were. I just said it 02:32:21
12 was a news story and that to print a news story, we don't 02:32:24
13 really need permission from her or the family or him, since 02:32:28
14 it's a news story. As a news magazine we have the right to 02:32:32
15 run it. 02:32:35
16 Q. Did Mr. Daus ever tell you in that call that 02:32:40
17 he did not want the images of Nancy Benoit published? 02:32:44
18 A. I don't think that was ever discuss-- 02:32:49
19 discussed, no. He never said that. 02:32:51
20 Q. Has he ever -- 02:32:54
21 A. I mean, he -- I don't think he was very -- he 02:32:55
22 wasn't happy about it. 02:32:57
23 I think his first concern was, was he in the 02:32:58
24 magazine. Were these screen grabs of him and his ex-wife 02:33:00
25

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1 the administrator of Nancy Benoit's estate. 02:33:53
2 Let me ask you a few things for the record, 02:33:57
3 Mr. Downey. 02:34:00
4 First of all, you don't compare Hustler to 02:34:01
5 Newsweek or Time magazine, do you? 02:34:04
6 A. In what regards? As far as like news content? 02:34:06
7 Q. That Hustler is a news magazine like Newsweek 02:34:10
8 or Time. 02:34:13
9 A. I would say -- 02:34:14
10 Q. You don't make that comparison, do you? 02:34:15
11 A. I would say Hustler has very good news 02:34:17
12 articles. 02:34:20
13 Q. You're -- you're telling the jury that 02:34:20
14 Newsweek, Hustler, and Time are all similar news magazines? 02:34:23
15 A. No, they're certainly not similar. They're -- 02:34:27
16 I would never argue that they're similar 02:34:28
17 magazines, but I'd say I would definitely argue that 02:34:30
18 Hustler's news content -- you know, and not just pieces 02:34:34
19 like this, but Hustler has great political stuff in there. 02:34:36
20 You know, I've got a -- the issue on the 02:34:39
21 stands right now, I've got an article in there on Barack 02:34:41
22 Obama and Franklin Roosevelt, and comparisons between the 02:34:44
23 two. 02:34:47
24 If you look at some of the writers, I mean, 02:34:47
25

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1 you've got Robert Scheer. You've got Nat Hentoff. These 02:34:49
2 are -- these are well-known political writers, and -- 02:34:52
3 Q. So you still write -- you still write some 02:34:54
4 articles for Hustler? 02:34:57
5 A. I do. 02:34:58
6 Q. How many have you written since your 02:34:59
7 employment was terminated? 02:35:01
8 A. One. One has appeared. 02:35:03
9 Q. And is that -- that the one that's just 02:35:05
10 appeared? 02:35:07
11 A. Uh-huh. 02:35:07
12 Q. The one that -- 02:35:09
13 Is that a "yes"? 02:35:10
14 A. That's -- I'm sorry. Yes. Yes. 02:35:11
15 Q. And is that a relationship that you got after 02:35:13
16 this lawsuit was filed? 02:35:17
17 A. What do you mean, "relationship"? 02:35:20
18 Q. This lawsuit being filed in March of 2008. 02:35:21
19 A. Well, the relationship began when I started at 02:35:25
20 Hustler. 02:35:27
21 Q. But the contract piece that is now appearing 02:35:31
22 in Hustler Magazine that you tell -- just told me about -- 02:35:33
23 A. Uh-huh. 02:35:36
24 Q. -- is something that came up after this 02:35:37
25

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1 I called Hustler. I called Donna Hahner, and I said -- you 02:36:36
2 know, I was in Kansas City at the time and I said, "Wow, I 02:36:43
3 just -- I was Googling Hustler." I think I was looking for 02:36:45
4 one of my articles and I read about it. 02:36:48
5 I said -- I offered my help to Donna Hahner. 02:36:51
6 I had never -- you know, I had never -- I 02:36:55
7 didn't leave on bad terms with Donna Hahner. I have a lot 02:36:57
8 of respect for Donna. Always have. 02:37:00
9 I offered my help and she accepted. 02:37:02
10 It kind of stood still for a long time. To be 02:37:07
11 honest, you know, I didn't hear anything for a while. 02:37:09
12 About a year and a half later, I'm getting 02:37:12
13 ready to have a daughter, and our insurance wasn't that 02:37:16
14 great, so I called up Bruce David and, you know, I asked 02:37:21
15 him would it be all right if I came in -- I mean, if I 02:37:27
16 submitted some stuff. 02:37:31
17 All the discussions that I've had about this 02:37:32
18 case, for the most part, have been with Donna Hahner, and 02:37:34
19 all the discussions I've had about submitting articles have 02:37:37
20 been with Bruce David. 02:37:39
21 I mean, I can -- I can honestly tell you -- I 02:37:42
22 can honestly tell you that my submitting articles to 02:37:44
23 Hustler Magazine has absolutely nothing to do with my 02:37:45
24 testimony. 02:37:48
25

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1 lawsuit was filed? 02:35:38
2 A. Yes. And I -- I -- 02:35:40
3 Q. How much are you making on that piece? 02:35:42
4 A. One dollar a word. 02:35:44
5 Q. A dollar a word. 02:35:46
6 How many words are you going to write? 02:35:47
7 A. It was -- well, it maxes out at 1500. 02:35:49
8 Q. So you're going to get \$1500 for that piece? 02:35:53
9 A. Yes. 02:35:56
10 Q. And that's the only piece you've done since 02:35:58
11 you left your employment? 02:36:00
12 A. I've submitted two more, but they haven't been 02:36:01
13 slated, as far as I know. 02:36:04
14 As in, they haven't been scheduled to appear. 02:36:06
15 Q. Did they pay you for those pieces? 02:36:09
16 A. No. Not yet, no. 02:36:12
17 Q. But if you -- if they accept them for 02:36:15
18 publication, do they pay you a dollar a word? 02:36:17
19 A. Up to the max, yes. 02:36:20
20 Q. And these are things that came up after this 02:36:24
21 lawsuit was filed? 02:36:26
22 A. These came up about, I would say, a year and a 02:36:28
23 half after I found out -- after -- 02:36:32
24 You know, when I found out about the lawsuit, 02:36:35
25

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1 Q. You can tell me -- you can tell me that 02:37:50
2 honestly? 02:37:52
3 A. Without a doubt. Absolutely nothing to do 02:37:53
4 with my testimony. 02:37:55
5 Q. How much have you been paid since you left 02:37:57
6 Hustler? 02:37:59
7 A. By Hustler? 02:38:00
8 Q. Yes. 02:38:02
9 A. 1500 for the article. 02:38:04
10 Q. Or any -- or any Larry Flynt company. 02:38:06
11 A. Nope. Just the -- that one article. 02:38:11
12 Q. And the two more that are in the hopper, so to 02:38:14
13 speak? 02:38:16
14 A. The two more that are on the way. 02:38:16
15 But you got understand, too, that I -- you 02:38:18
16 know, I wrote quite a bit for the magazine when I was 02:38:21
17 there. It's not like -- I mean, with all -- with all 02:38:23
18 honesty, I mean, I'm pretty good -- I'm a pretty good 02:38:26
19 writer. I mean, I contribute good stuff to the magazine. 02:38:28
20 So I don't even know if Bruce -- when he 02:38:31
21 agreed to -- when he agreed to allow me to submit stuff to 02:38:35
22 the magazine, I didn't even know if he was -- he didn't 02:38:40
23 even know if I was giving testimony or not. 02:38:43
24 Q. Well, you said earlier that he wrote an e-mail 02:38:45
25

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1 that upset -- upset you. 02:38:47
2 What did he say about you in that e-mail? 02:38:49
3 A. He wrote in his e-mail -- 02:38:53
4 It wasn't exactly what he had written that -- 02:38:58
5 that upset me so much. 02:39:00
6 He had written an e-mail saying that he wanted 02:39:01
7 to talk to me about doing a better job. 02:39:03
8 What really upset me is that he had two of my 02:39:06
9 coworkers -- he kind of told them to go along with what he 02:39:09
10 was saying. So they wrote -- 02:39:12
11 Q. Well, he actually terminated you, didn't he? 02:39:16
12 A. No. No, he didn't. I quit. 02:39:19
13 I gave my two weeks as soon as I read the 02:39:21
14 e-mail, and then the next day, I came in because I'd given 02:39:23
15 my two weeks, and they -- you know, we kind of got into an 02:39:29
16 argument and I was angry that he had asked these other two 02:39:33
17 people, my coworkers, to write stuff that I knew was not 02:39:38
18 true. Because I knew I was doing a good job. 02:39:41
19 You know, they -- they went through like seven 02:39:44
20 or eight replacements of me in a -- less than a year after 02:39:46
21 I left. 02:39:49
22 And so, you know, I went -- before I did that, 02:39:53
23 I went up to -- and I spoke to Donna and I said, "Donna, 02:39:56
24 you know, I've always been honest with you. This really 02:39:59
25

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1 Hustler, and since this lawsuit by Mrs. Toffoloni against 02:41:05
2 Hustler was filed -- 02:41:09
3 A. Uh-huh. 02:41:10
4 Q. -- you've been paid \$1500 for an article and 02:41:11
5 you have two more in the hopper? 02:41:15
6 A. That's correct. 02:41:16
7 Q. And all this came after the lawsuit? 02:41:19
8 A. All of this came after the lawsuit. 02:41:21
9 And the person that makes the decisions on 02:41:23
10 whether I'm going to be in the magazine or not is Bruce 02:41:24
11 David, and the discussions that Bruce David and I have had 02:41:29
12 about this case have mostly revolved around speculating who 02:41:33
13 is going to play us if this goes to the Supreme Court and 02:41:38
14 there's a People vs. Larry Flynt 2. That's been like 02:41:41
15 the -- that's been the gist of what we've discussed about 02:41:45
16 this case. 02:41:49
17 Q. Let me -- let me make sure that we understand 02:41:53
18 each other, Mr. Downey. 02:41:56
19 As an employee of Hustler Magazine -- 02:41:57
20 A. I mean, I think you're trying to -- 02:41:59
21 Q. Excuse me? 02:42:01
22 A. You're trying to say that, you know, it's kind 02:42:02
23 of a quid pro quo, which I'm telling you right now is 02:42:03
24 absolutely not the case. The two have nothing to do with 02:42:06
25

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1 upsets me and I don't -- you know, I just don't feel like 02:40:01
2 dealing with this kind of stuff anymore." 02:40:04
3 I think she understood. 02:40:07
4 And I said, "You know, I'm going to give my 02:40:09
5 two weeks notice." 02:40:11
6 She kind of tried to talk me out of it, but I 02:40:12
7 was -- I was insistent. 02:40:15
8 Like I said, my wife had left, so I was 02:40:16
9 considering moving back to Missouri anyways. 02:40:18
10 So it really got heated when they started 02:40:23
11 asking me for the MySpace information. That's where most 02:40:25
12 of the trouble came from because they're like, "Well, 02:40:29
13 you've been freelancing doing this Girls of MySpace 02:40:33
14 section. We want all the passwords. We want all that 02:40:35
15 stuff for the MySpace." 02:40:37
16 And I said, "Listen, I was doing that 02:40:39
17 freelance. You guys were not paying me one cent to 02:40:42
18 maintain that MySpace page. You know, that's a whole 02:40:45
19 different thing. You guys didn't ask me to do that. I was 02:40:48
20 doing that on my own time." 02:40:51
21 And so that's when I got into it with HR and a 02:40:53
22 little bit with Donna, you know. We were always 02:40:56
23 professional then, but that's how it ended. 02:40:59
24 Q. And since -- since you left employment at 02:41:03
25

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1 each other. 02:42:09
2 Q. Thank you for that. 02:42:09
3 A. Yeah. 02:42:10
4 Q. Thank you very much for that. We'll let the 02:42:11
5 jury decide that, though. 02:42:12
6 A. Okay. 02:42:14
7 Q. As an employee of Hustler, you never asked 02:42:15
8 Maureen Toffoloni for permission to publish the images of 02:42:18
9 her daughter, did you? 02:42:23
10 A. No. 02:42:24
11 Q. As an employee of Hustler Magazine, you never 02:42:27
12 asked Mrs. Toffoloni for a model's release to publish those 02:42:31
13 images, did you? 02:42:35
14 A. No. 02:42:36
15 Q. As an employee of Hustler Magazine, you never 02:42:38
16 offered or attempted to pay Maureen Toffoloni any amount of 02:42:41
17 money for the right to publish the images of her daughter, 02:42:47
18 did you? 02:42:50
19 A. No. I mean, I don't think these people in any 02:42:52
20 of these instances right here (indicating) paid the subject 02:42:54
21 of the photographs either, though. 02:42:57
22 You know, I don't think -- 02:42:59
23 Q. Well, Mr. Downey, you do realize, don't you, 02:43:01
24 that the courts have held that Hustler did not have the 02:43:03
25

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1 rights to publish those images? 02:43:06
 2 You know that, don't you? 02:43:07
 3 A. I -- I know that that one court did, yes. The 02:43:09
 4 lower court ruled -- 02:43:11
 5 Q. You know that -- 02:43:12
 6 A. The lower court, if I'm not mistaken, ruled 02:43:14
 7 the opposite, though. 02:43:16
 8 Q. Well, you know the court of appeals has ruled 02:43:17
 9 that Hustler violated Nancy Benoit's right of publicity. 02:43:18
 10 You know that, don't you? 02:43:23
 11 A. I do know that. 02:43:24
 12 Q. And you know that the Supreme Court refused to 02:43:25
 13 take the case, don't you? 02:43:27
 14 A. I do know that. 02:43:29
 15 Q. So you know that what you did was wrong. 02:43:30
 16 Don't you know that? 02:43:33
 17 A. Well, what -- according to the judge's 02:43:34
 18 decision, yes, what Hustler did was wrong. 02:43:36
 19 Q. Okay. You simply published -- 02:43:40
 20 A. But it was -- it was very clearly an honest 02:43:43
 21 mistake. 02:43:45
 22 I mean, we were operating -- we were operating 02:43:45
 23 under the idea that what we were doing was perfectly legal. 02:43:47
 24 Q. All right. We'll -- we'll -- we'll let the 02:43:50
 25

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1 A. Yeah. 02:44:50
 2 Q. That's your experience in the publishing 02:44:52
 3 business? 02:44:53
 4 A. There was a -- there was a -- there was a time 02:44:54
 5 frame in between there where I was writing scripts, I was 02:44:55
 6 submitting stuff to Hustler Magazine, when I was out in 02:44:57
 7 Los Angeles. 02:45:00
 8 But, yeah, I went -- the only things I've ever 02:45:02
 9 had published were -- before that were in the college 02:45:05
 10 newspaper. 02:45:08
 11 Q. Have you obtained, in your work at Hustler, 02:45:10
 12 releases from photography models in the past? 02:45:14
 13 A. I have. 02:45:18
 14 Q. But you did not do that in this case? 02:45:20
 15 A. No. 02:45:21
 16 Q. You wrote the copy of the story -- 02:45:28
 17 A. The -- the -- 02:45:31
 18 I'm sorry. The releases that I obtained in 02:45:32
 19 the past -- 02:45:33
 20 Q. I'm asking the question now. 02:45:34
 21 A. Oh, okay. 02:45:35
 22 Q. You just told me -- 02:45:37
 23 MR. BAUER: He can explain the answer -- 02:45:38
 24 Q. (By Mr. Decker) You just told me that you 02:45:40
 25

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1 jury decide that. 02:43:52
 2 But the point of the matter is, you published 02:43:53
 3 the images of Nancy Benoit without discussing the matter 02:43:55
 4 with Mrs. Toffoloni at all. 02:44:00
 5 That's the truth, isn't it? 02:44:02
 6 A. That is absolutely -- 02:44:05
 7 Why -- can -- why would I talk to her mother 02:44:07
 8 about this? I don't understand what your -- why would I 02:44:09
 9 ask her mother if we could publish the image- -- 02:44:12
 10 Q. I want you to verify for me on the record that 02:44:14
 11 you did not make any attempt to discuss that with her 02:44:16
 12 mother. 02:44:18
 13 A. I made absolutely zero attempt to talk to her 02:44:18
 14 mother about showing these images. 02:44:21
 15 Q. Prior to your work at Hustler beginning in 02:44:22
 16 February of 2006, how long had you been in the publishing 02:44:25
 17 business? 02:44:30
 18 A. How often had I been published? 02:44:33
 19 Q. How long had you been in the publishing 02:44:35
 20 business. 02:44:38
 21 A. Probably since college when I wrote for the 02:44:40
 22 student newspaper. 02:44:42
 23 Q. So you went from writing for your student 02:44:44
 24 newspaper to Hustler Magazine? 02:44:47
 25

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1 had -- that you had, in fact, obtained model's releases in 02:45:41
 2 your work at Hustler, but you did not do so in this case? 02:45:44
 3 A. The model releases that I obtained for Hustler 02:45:48
 4 were for the Girls of MySpace section. They were not 02:45:50
 5 celebrities. They were not news articles. These were 02:45:54
 6 girls looking for publicity in Hustler Magazine. These 02:45:56
 7 were just normal everyday girls that submitted nude 02:45:58
 8 photographs. 02:46:02
 9 Completely different situation. 02:46:04
 10 Q. Can we -- can we agree that you did not get a 02:46:05
 11 release from Nancy Benoit or her mother for the publication 02:46:08
 12 of these images? 02:46:12
 13 A. We can agree on that, yes. 02:46:14
 14 Q. All right. And we also agree that you wrote 02:46:16
 15 the copy for the story that appeared with the images that 02:46:20
 16 were published in Hustler Magazine? 02:46:25
 17 A. Yes. I wrote the copy. 02:46:28
 18 Q. All right. Now, there -- there is a section 02:46:32
 19 in the magazine article that you say that you wrote -- 02:46:35
 20 A. Uh-huh. 02:46:39
 21 Q. -- that says, "The original print negatives 02:46:40
 22 were destroyed at Nancy's behest." 02:46:44
 23 A. Yes, sir. 02:46:47
 24 Q. Do you remember that? 02:46:48
 25

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1 A. Yes, I do. 02:46:49
2 Q. So can we agree, Mr. Downey, that you knew 02:46:51
3 that at least insofar as the photographs are concerned, she 02:46:56
4 did not want those published? 02:47:00
5 A. That's correct. And we did not publish those 02:47:02
6 photographs. 02:47:04
7 We published -- what we published were screen 02:47:08
8 grabs from a video taken on a -- on a -- before the 02:47:10
9 incident, I believe. Before the photographs were taken. 02:47:14
10 Q. And your -- and your logic, if I can call it 02:47:16
11 that, in this situation, was you -- you knew she didn't 02:47:20
12 want the photographs published, but you thought that it was 02:47:23
13 okay to publish the videotape images? 02:47:26
14 A. It was okay. 02:47:32
15 I mean, to be honest, I mean, her -- first of 02:47:33
16 all, she's deceased. Second of all, it's a news story. 02:47:35
17 You know, I'm sure a lot of people would like 02:47:39
18 images not to be published, if they're a news story, but 02:47:42
19 they don't get to make that decision. 02:47:44
20 Q. But you -- now going back to my earlier line 02:47:48
21 of questioning, you do understand now that you were wrong 02:47:50
22 about that, don't you? 02:47:52
23 A. I know that the judge said that we were wrong. 02:47:53
24 Q. Okay. 02:47:57
25

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1 whether you should publish these? 02:48:52
2 A. Yes. 02:48:54
3 Q. So you went to somebody and you said, "Is it 02:48:55
4 okay if I publish these photo- -- these photographic images 02:48:58
5 of Nancy Benoit without her consent?" 02:49:02
6 MR. BAUER: Objection. Hang on. 02:49:06
7 Do not answer that question to the extent it 02:49:07
8 goes to what communications you had or you know that 02:49:10
9 anybody else at Hustler had with a lawyer. 02:49:14
10 THE WITNESS: Sure. 02:49:16
11 MR. BAUER: It's perfectly okay for you to 02:49:17
12 acknowledge that lawyers were talked to, but you are not 02:49:19
13 going to discuss the substance of that. Mr. Decker knows 02:49:20
14 he cannot ask you the substance of those communications. 02:49:23
15 MR. DECKER: I disagree. I think he's opened 02:49:26
16 the door. He said he got legal advice about publishing the 02:49:27
17 photographs. I think that's exactly -- 02:49:31
18 MR. BAUER: That's not a waiver of the 02:49:33
19 attorney-client privilege -- 02:49:34
20 MR. DECKER: I think it is. 02:49:35
21 MR. BAUER: -- but -- 02:49:36
22 MR. DECKER: I think it is. 02:49:37
23 MR. BAUER: You will not be answering that 02:49:38
24 question. 02:49:39
25

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1 A. I think that the -- my personal opinion is 02:47:57
2 that this was judged, well, more on the merits of -- of a 02:47:59
3 grieving mother versus Larry Flynt. Other than the facts 02:48:04
4 of the case. 02:48:08
5 Q. All right. Let's establish a few other things 02:48:09
6 that I think are obvious from the record. 02:48:10
7 You're not a lawyer, are you? 02:48:13
8 A. No, I'm not a lawyer. 02:48:14
9 Q. You've never been to law school? 02:48:16
10 A. No. 02:48:17
11 Q. You've not trained in the law? 02:48:19
12 A. No. 02:48:21
13 But there are -- but there are lawyers that 02:48:22
14 seriously disagree with what your opinion is. 02:48:24
15 Q. Well, it's not my opinion, Mr. Downey. It's 02:48:28
16 the court's opinion. 02:48:30
17 A. Okay. The court -- there are serious lawyers 02:48:31
18 who disagree with the court's opinion as well. 02:48:33
19 Q. Well, that's the law, isn't it? 02:48:35
20 A. I'm saying that there's -- there's different 02:48:38
21 ways to view the law or else the lower court wouldn't have 02:48:39
22 ruled in the complete opposite direction that this court 02:48:42
23 ruled. 02:48:44
24 Q. So not being a lawyer, you sought legal advice 02:48:47
25

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1 THE WITNESS: Okay. I won't answer the 02:49:40
2 question. 02:49:41
3 MR. DECKER: You're instructing him not to 02:49:42
4 answer? 02:49:43
5 MR. BAUER: I most certainly am. 02:49:44
6 A. I'll -- 02:49:46
7 Q. (By Mr. Decker) You sought legal advice 02:49:47
8 whether you had the right to publish these photographs 02:49:48
9 without Maureen Toffoloni's permission, is that correct? 02:49:50
10 A. Without getting into -- without getting into 02:49:53
11 the specifics, I'll say this: Every single article that 02:49:54
12 appears in Hustler Magazine is vetted by the legal counsel 02:49:57
13 or Hustler's legal team. This was no exception. 02:50:03
14 Q. Have you -- 02:50:05
15 A. Every single article is vetted by lawyers. 02:50:05
16 Q. Have you, as an employee of Hustler, or 02:50:10
17 Hustler Magazine while you were employed there ever been 02:50:13
18 sued for publishing a person's image without their consent? 02:50:16
19 A. Have -- have I personally been sued? 02:50:21
20 Or what are you asking? 02:50:23
21 Q. As an employee of Hustler Magazine, have you 02:50:24
22 or has Hustler Magazine, while you were employed there, 02:50:27
23 ever been sued by someone for publishing their image 02:50:31
24 without their consent? 02:50:34
25

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1 A. I have never been sued, and I -- I have no 02:50:36
2 idea whether Hustler's been sued or not. 02:50:40
3 Like I said, I only found out about this 02:50:42
4 lawsuit because I Googled "Hustler and Tyler Downey." 02:50:43
5 So I -- I don't have any information on any 02:50:47
6 legal cases or anything like that outside of what I was a 02:50:51
7 witness to. 02:50:55
8 Q. You're not -- as you sit here today, you're 02:50:57
9 not aware of any other people who have sued Hustler for 02:50:58
10 publishing their image without permission? 02:51:02
11 A. Oh, I mean I would be surprised if somebody 02:51:07
12 hadn't sued Hustler. I'll say that. I think -- yeah. 02:51:11
13 Q. That's not my question. 02:51:13
14 A. Okay. I don't know specifically -- 02:51:14
15 Q. My question was -- 02:51:16
16 A. I don't know specifically of anybody who 02:51:16
17 has -- I cannot say, "This person has sued Hustler 02:51:18
18 Magazine," no. 02:51:20
19 Q. Do you know of the general subject matter of 02:51:22
20 lawsuits by people against Hustler for publishing their 02:51:25
21 image without permission? 02:51:28
22 A. I'm familiar with some of the lawsuits. 02:51:30
23 The Jerry Falwell lawsuit, obviously. 02:51:31
24 I think there's been former employees suing 02:51:36
25

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1 Q. While you were there, did you see the original 02:52:40
2 or a copy of my letter to Hustler Magazine about the 02:52:43
3 publication of the images of Nancy Benoit in the March 2008 02:52:48
4 edition? 02:52:53
5 A. No, sir. 02:52:54
6 Q. Did you discuss the contents of that letter 02:53:00
7 with anyone at Hustler while you were there? 02:53:03
8 A. This is the first time I've ever heard about 02:53:06
9 your letter, so no. 02:53:08
10 Q. All right. So while you were at Hustler, 02:53:10
11 until the last day you were there, and you -- you being the 02:53:16
12 author of the article, no one ever came to you and said, 02:53:21
13 "We've gotten a letter from a lawyer in Atlanta objecting 02:53:23
14 to the publication of these images"? 02:53:29
15 A. Nope. 02:53:32
16 Like I said, I was -- I'm not -- I'm not privy 02:53:36
17 to the -- you know, to the legal -- 02:53:39
18 There's a whole legal department. Those -- 02:53:42
19 those people are higher up on the food chain that would be 02:53:44
20 having that discussion. Not me. 02:53:46
21 Q. And after you left Hustler in February of 02:53:48
22 2008, and since you have reestablished a relationship, a 02:53:53
23 financial relationship, with Hustler Magazine, no one has 02:53:57
24 mentioned my letter to you or the contents of the letter or 02:54:01
25

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1 Hustler. 02:51:38
2 But as far as like a celebrity, I don't know. 02:51:40
3 I don't think so. Not that I know of. 02:51:44
4 Q. No, that wasn't my question. Listen up one 02:51:45
5 more time. 02:51:47
6 A. Thank you. 02:51:49
7 Q. Are you aware of any lawsuits against Hustler 02:51:49
8 by people for Hustler publishing their image without 02:51:51
9 permission? 02:51:59
10 A. I don't know how many times I can tell you 02:52:00
11 this, but no, I don't know of any specific example. 02:52:02
12 Q. Well, that's the answer. 02:52:05
13 A. Okay. I've told you that about three times. 02:52:06
14 Q. All right. You don't know of any such cases? 02:52:08
15 A. No. No. 02:52:10
16 Q. Did -- while you were at Hustler -- 02:52:22
17 You left in February of 2008, right? 02:52:23
18 A. Yeah. Yes. February, March. 02:52:27
19 Q. Did you leave on February the 15th? 02:52:30
20 February 28th? What? 02:52:32
21 A. I don't remember exactly. 02:52:33
22 Q. While you were -- 02:52:36
23 A. I gave my two weeks but I didn't last two 02:52:36
24 weeks. 02:52:38
25

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1 anything about the letter? 02:54:06
2 A. No. I -- no. I -- I guess your letter didn't 02:54:08
3 have -- your letter was -- has never been mentioned to me 02:54:11
4 prior to this moment right now. 02:54:15
5 Q. Do you know if anyone made any effort to 02:54:20
6 minimize the damage to Mrs. Toffoloni by the publication of 02:54:25
7 the Nancy Benoit images in the March 2008 edition? 02:54:33
8 A. Can you -- 02:54:39
9 Do I know of any way to mitigate? What do you 02:54:40
10 mean? 02:54:42
11 Q. Well, did they -- anybody do anything -- 02:54:43
12 that's my question -- that you're aware of to mitigate the 02:54:46
13 damage to Mrs. Toffoloni as a result of the publication of 02:54:49
14 those images? 02:54:53
15 A. Mrs. Toffoloni was not our concern. 02:54:55
16 No. 02:54:57
17 This was a news story and we were publishing 02:54:58
18 the images. In our view -- 02:55:03
19 Q. I'm quite -- 02:55:05
20 A. And in our view, Mrs. Toffoloni actually had 02:55:05
21 nothing to do with this. 02:55:08
22 Q. I'm quite willing to agree that Mrs. Toffoloni 02:55:09
23 was not your concern. 02:55:11
24 My question to you, however, is: Are you 02:55:13
25

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1 aware of any efforts that were ever made by Hustler to 02:55:15
2 minimize the damage to Mrs. Toffoloni as a result of the 02:55:19
3 publication of these images? 02:55:23
4 A. Are you saying did -- did we like call and 02:55:25
5 apologize to her for -- 02:55:27
6 What -- first of all, what damages are you 02:55:29
7 referring to? 02:55:31
8 Q. Let me ask you the question my way, and answer 02:55:35
9 it if you can. If you say no, you know of no such efforts, 02:55:37
10 then that's the answer. 02:55:41
11 A. Uh-huh. 02:55:42
12 Q. Do you? 02:55:44
13 A. Well, without you being more specific, I don't 02:55:45
14 know. 02:55:47
15 MR. BAUER: If you don't understand the 02:55:48
16 question -- 02:55:49
17 A. No, I don't know of any- -- I don't know of 02:55:50
18 anything we did to lessen her damages, according to you, 02:55:51
19 whatever her damages are. 02:55:59
20 What are her damages? 02:56:00
21 Q. (By Mr. Decker) All right. Well, we're going 02:56:02
22 to find out that at the end of this case. 02:56:03
23 A. Okay. 02:56:05
24 Q. But so far as you know, Hustler didn't do 02:56:05
25

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1 magazines? 02:57:15
2 A. I think it -- it's considered additional 02:57:16
3 marketing material. 02:57:18
4 Q. One reason was to boost sales, wasn't it? 02:57:21
5 A. I would say, yeah. 02:57:24
6 Q. Do you know the content of the DVD that was 02:57:26
7 sold with the March 2008 edition? 02:57:28
8 A. I do not. 02:57:32
9 Q. Did you ever look at those DVDs? 02:57:34
10 A. Yeah, I saw the DVDs. 02:57:38
11 I mean, as far as I know -- as far as I know, 02:57:41
12 they were mostly compilation DVDs of scenes from Hustler 02:57:43
13 movies. 02:57:49
14 Q. They're pornographic, aren't they? 02:57:52
15 A. They are pornographic, yes. 02:57:54
16 Q. Did -- did you look at the DVD that was sold 02:57:57
17 with the March 2008 edition? 02:58:00
18 A. I don't know which DVD it is, but no. 02:58:04
19 I mean, I might have seen it. I might have 02:58:07
20 seen some of the scenes. I don't know. 02:58:08
21 Q. Did you make it a practice of looking at the 02:58:11
22 DVDs that were sold with the newsstand editions of 02:58:14
23 Hustler Magazine? 02:58:18
24 A. Not once that I can ever recall. 02:58:20
25

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1 anything to try to mitigate those damages? 02:56:08
2 A. We did not try to mitigate her hurt feelings, 02:56:10
3 or whatever it is her damages were. 02:56:12
4 Q. The one -- the one month that you were there 02:56:15
5 after -- 02:56:17
6 Let me represent to you that my letter was 02:56:18
7 dated January the 16th, 2008. 02:56:20
8 And you did not leave until the end of 02:56:25
9 February, 2008 -- 02:56:27
10 A. Uh-huh. 02:56:28
11 Q. -- is that correct? 02:56:30
12 A. That's correct. 02:56:31
13 Q. All right. And so during that time period, 02:56:33
14 you heard nothing within the company about efforts to take 02:56:35
15 any steps whatsoever regarding the Nancy Benoit images in 02:56:41
16 the March 2008 edition -- 02:56:46
17 A. That's correct. 02:56:50
18 Q. -- is that correct? 02:56:51
19 A. That is correct. 02:56:52
20 Q. All right. Are you aware, Mr. Downey, that 02:56:52
21 the March 2008 edition of Hustler was sold with a DVD? 02:56:58
22 A. I was not aware, but I know that DVDs were 02:57:05
23 often put inside the magazines. 02:57:08
24 Q. Do you know why DVDs were often put inside the 02:57:11
25

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1 Q. I'm sorry, I didn't understand that. 02:58:25
2 A. I didn't get my mag- -- I didn't get Hustler 02:58:26
3 magazines from the newsstand. 02:58:28
4 You know, when I got a copy of the magazine, 02:58:29
5 it was -- it came in a box. We had boxes of the magazines. 02:58:31
6 The DVDs weren't in the copies that the staff got. 02:58:33
7 Q. All right. My question was: Did you 02:58:37
8 routinely look at the DVDs that were sold with the 02:58:40
9 magazines, including the March 2008 edition? 02:58:44
10 A. I have seen Hustler DVDs. I did not 02:58:47
11 specifically look at the Hustler -- at the March 2008 DVD 02:58:49
12 inset, no. 02:58:54
13 Q. How would you describe the content of the 02:58:56
14 DVDs sold with the Hustler Magazine? 02:58:59
15 A. They are pornographic DVDs. 02:59:03
16 Like I said, they're a compilation -- 02:59:04
17 Q. Are they -- 02:59:06
18 A. -- they're compilation scenes, so I think they 02:59:07
19 take scenes from Hustler movies, put them all together, 02:59:11
20 press it on a DVD, and ship it out with the magazine. 02:59:14
21 Q. Do they contain violence? 02:59:18
22 A. No, not that I know of. 02:59:21
23 What do you mean by "violence"? 02:59:23
24 Q. You wouldn't describe -- you wouldn't describe 02:59:25
25

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1 any of the contents of the DVDs sold with the Hustler 02:59:27
2 magazines as containing violent sex or violence against 02:59:31
3 women? 02:59:35
4 A. No, I don't -- I haven't seen a Hustler 02:59:36
5 Magazine -- or a Hustler DVD that does that. 02:59:39
6 Our lawyers -- as far as I know, the lawyers 02:59:41
7 pretty much put a -- I mean, say no to that kind of thing. 02:59:43
8 When you say -- let me -- let me -- can I ask 02:59:49
9 you a question? 02:59:50
10 When you say "violence against women," what 02:59:51
11 are you referring to? What specifically? 02:59:52
12 Q. Well, I'm just asking you if, in your opinion, 02:59:55
13 what you saw on those DVDs that you did look at -- 02:59:58
14 A. Uh-huh. 03:00:00
15 Q. -- you would characterize as violence. Sexual 03:00:01
16 violence, violence against women. 03:00:04
17 A. Absolutely not. 03:00:06
18 Q. You would not? 03:00:06
19 A. No, I would not. 03:00:07
20 Q. All right. All right. The Nancy Benoit 03:00:08
21 article certainly had the angle of violence in it, didn't 03:00:13
22 it? 03:00:17
23 A. Well, she was murdered, and we mentioned that. 03:00:19
24 Q. It says, "Chris Benoit murders his son and 03:00:23
25

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1 a few times for the cover lines. 03:01:26
2 Q. The -- the banner headline of the article 03:01:29
3 containing the Nancy Benoit images says "The long-lost 03:01:33
4 images of wrestler Chris Benoit's doomed wife." 03:01:38
5 Who wrote that? 03:01:41
6 A. I don't remember, to be honest with you. It 03:01:48
7 might have been -- 03:01:52
8 I don't know. I don't know who wrote that. I 03:01:53
9 don't think I wrote that. 03:01:56
10 Q. You didn't write it? 03:01:57
11 A. I don't know who wrote that. 03:02:01
12 THE VIDEOGRAPHER: Excuse me. This is the 03:02:02
13 videographer. We have 3 minutes remaining on this tape. 03:02:03
14 Q. (By Mr. Decker) Who else would have possibly 03:02:06
15 written that? 03:02:08
16 A. It could have been the features editor. It 03:02:08
17 could have been Bruce David. It could have been Morgen 03:02:10
18 Hagen, the managing editor. There's a number of people who 03:02:12
19 could have written it. 03:02:17
20 Q. Would you characterize that as -- as an angle 03:02:19
21 tending toward violence? 03:02:25
22 A. "The long-lost images of wrestler Chris 03:02:28
23 Benoit's doomed wife," do I think that is an angle inclined 03:02:31
24 to violence. 03:02:35
25

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1 wife." That's the caption on the front of the magazine. 03:00:26
2 A. Actually, it says -- actually, it says, 03:00:31
3 "Wrestler Chris Benoit's murdered wife nude," is what it 03:00:33
4 says on the front of the magazine. 03:00:37
5 Q. Well, that's one of them that certainly says 03:00:39
6 that. Her -- his murdered wife nude. That's on the 03:00:40
7 version of the magazine that's available to -- to the rest 03:00:45
8 of the world. 03:00:48
9 A. Uh-huh. 03:00:49
10 Q. And then the version that's available to 03:00:50
11 Canada says "Chris Benoit murders his son and wife" -- 03:00:52
12 A. I don't see where you see that. 03:00:56
13 Q. -- right? 03:00:57
14 A. I don't know what you're referring to on that. 03:00:58
15 I'm sorry. 03:00:59
16 All I see is "Wrestler" -- 03:01:01
17 Q. You wrote -- who -- who wrote the copy for 03:01:03
18 the -- the cover of the magazine? 03:01:05
19 A. The cover of the magazine -- 03:01:08
20 Q. Whether Canadian or the rest of the world. 03:01:10
21 A. I don't know who writes the Canadian cover 03:01:14
22 lines. I know who writes the American cover lines and 03:01:16
23 that's kind of a joint effort by the staff. It's mostly 03:01:19
24 Bruce David, Keith Valcourt, Mark Johnson. I was in there 03:01:22
25

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1 I don't think the images imply violence. I 03:02:38
2 think that her -- the news story of what happened to her 03:02:40
3 implies violence. 03:02:44
4 Q. The images of her -- his doomed wife, that 03:02:46
5 doesn't imply violence to you? 03:02:49
6 A. The images, no. "Doomed," yes. 03:02:51
7 The images of her are of her laying around 03:02:54
8 naked. I don't see how that's violent. 03:02:57
9 Q. I'm asking you now about the -- the caption, 03:02:59
10 the banner that says the images -- 03:03:01
11 A. That's what I'm answering. I'm saying that 03:03:04
12 "Chris Benoit's doomed wife" implies violence, but the 03:03:05
13 images -- 03:03:08
14 Q. Aren't -- 03:03:09
15 A. -- "The long-lost images of Chris Benoit's 03:03:09
16 doomed wife," I don't think people would read that and say, 03:03:13
17 "Oh, these are murder scenes." 03:03:15
18 Q. Do you, Mr. Downey, believe that Nancy Benoit 03:03:20
19 or her mother, as a representative of her estate, should 03:03:26
20 have had the right to decide if her image was associated 03:03:31
21 with something like Hustler Magazine? 03:03:35
22 A. You know, that's a sticky situation. 03:03:41
23 No, I don't. It's a news story. 03:03:43
24 You know, I don't want to say -- I don't want 03:03:50
25

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1 to say something that's going to come off as wrong, but, 03:03:53
2 you know, first of all, she had taken these images. She -- 03:03:58
3 nobody forced her to take these images. I know that's not 03:04:02
4 what we're discussing. 03:04:04
5 You know, second of all, she was a -- involved 03:04:06
6 in professional wrestler [sic]. 03:04:08
7 I mean, I think some of the story lines that 03:04:10
8 she was involved in -- you know, extra-marital affairs, 03:04:12
9 Satanism was some of the story lines -- 03:04:18
10 Compared to some of the things that she 03:04:21
11 actively pursued, I think these images are rather tame, to 03:04:23
12 be perfectly honest with you. 03:04:27
13 Q. My question -- and I'll ask it again -- do you 03:04:29
14 believe that Nancy Benoit or her mother should have had the 03:04:32
15 right to decide if her image was associated with Hustler 03:04:37
16 Magazine? 03:04:41
17 A. No. The subjects of a news story do not get 03:04:42
18 to decide whether their images are used or not. 03:04:45
19 Q. And you get to decide if it's -- if it's a 03:04:50
20 news story? 03:04:52
21 A. I don't personally, but Hustler Magazine in 03:04:56
22 conjunction with their legal team does, yeah. Yes. 03:05:00
23 Q. So who -- Hustler Magazine is just people. 03:05:05
24 A. That's right. 03:05:09
25

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1 view? 03:06:27
2 A. She did not forfeit the con- -- to control the 03:06:28
3 right to her image, but she definitely forfeited some of 03:06:30
4 her privacy. 03:06:33
5 I don't know the legal justification -- 03:06:34
6 Q. Did she -- 03:06:36
7 A. I don't know the legal justifications for 03:06:37
8 this, but I know that -- you know, I know that paparazzi 03:06:38
9 can shoot celebrities and then they can put them in In 03:06:41
10 Touch magazine and legally they're on solid ground with 03:06:44
11 that, yes. 03:06:46
12 THE VIDEOGRAPHER: Excuse me. This is the 03:06:48
13 videographer. We need to -- 03:06:50
14 Q. (By Mr. Decker) But it's the right to control 03:06:52
15 her image that you're saying Nancy Benoit lost? 03:06:54
16 A. When you say "control her image," I mean, 03:06:56
17 we're using this as a news story. We're not using this 03:06:58
18 to -- 03:07:01
19 I mean, I don't understand. Newsweek uses 03:07:03
20 images all the time of people and they -- these people 03:07:04
21 don't get to control their images. 03:07:08
22 THE VIDEOGRAPHER: This is the videographer. 03:07:10
23 We need to change tapes, please. 03:07:11
24 MR. DECKER: All right. 03:07:14
25

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1 Q. So it's you and Bruce David and Larry Flynt 03:05:09
2 get to decide if something's news so that you can put a 03:05:12
3 person's image in the magazine? 03:05:16
4 A. Well, obviously that's not correct. I guess 03:05:17
5 some judge in Georgia gets to decide that. 03:05:20
6 Q. But the person whose image is in question 03:05:32
7 doesn't get to decide? 03:05:35
8 A. No. 03:05:36
9 Does Barack Obama get to decide which images 03:05:37
10 of -- of him are used in a news piece? No, he doesn't. 03:05:39
11 Q. You're comparing the deceased, Nancy Benoit, 03:05:43
12 with Barack -- the President of the United States? 03:05:46
13 A. I'm comparing that they're both news stories. 03:05:49
14 The content is certainly different, obviously, 03:05:51
15 but the -- you know, the legal -- the legal justification 03:05:53
16 is the same. 03:05:56
17 Q. Would -- would you want for yourself or a 03:05:58
18 family member the right to decide if your image was 03:06:01
19 associated with Hustler Magazine? 03:06:04
20 A. If I was a celebrity, then I should 03:06:09
21 definitely -- I would understand that you are giving up 03:06:13
22 some of your privacy in pursuing being a famous celebrity. 03:06:15
23 Q. So Nancy Benoit forfeited her right of -- of 03:06:20
24 privacy, forfeited her right to control her image, in your 03:06:24
25

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1 THE VIDEOGRAPHER: The time is 3:07. We are 03:07:15
2 off the record. 03:07:17
3 (Recess taken from 3:07 p.m. to 3:08 p.m.) 03:07:18
4 THE VIDEOGRAPHER: Okay. The time is 3:08. 03:08:26
5 We are back on the record. 03:08:29
6 Q. (By Mr. Decker) Mr. Downey, do you have any 03:08:32
7 knowledge whatsoever as to the value that accrued to 03:08:33
8 Hustler Magazine as a result of it publishing the images of 03:08:40
9 Nancy Benoit without her permission? 03:08:43
10 A. No, I do not. 03:08:46
11 Q. You were not privy to any of that financial 03:08:50
12 information, were you? 03:08:52
13 A. No. 03:08:53
14 Q. Who do you write for today, as we sit here 03:09:02
15 today? 03:09:06
16 A. I write for Hustler Magazine and I -- I work 03:09:06
17 for my friend's web design company here in Kansas City, so 03:09:11
18 I do a lot of content writing for him. 03:09:15
19 That was my job until my daughter was born. 03:09:17
20 Q. Well, tell me what publications you've had 03:09:21
21 since you left Hustler other than the three that you have 03:09:24
22 submitted to Hustler, one of which you've been paid \$1500 03:09:27
23 for. 03:09:30
24 A. I haven't submitted anything -- 03:09:31
25

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1 Well, I've submitted screenplays. I've been 03:09:33
2 writing screenplays and I've been working on a website. 03:09:36
3 It's called -- it's called cliffhangerfalls.com. That's 03:09:39
4 what I've been working on. 03:09:42
5 Q. But nothing that you've received any money 03:09:45
6 for? 03:09:47
7 A. No. Not yet. 03:09:47
8 Q. Are you involved -- are you involved in the 03:09:50
9 pornography business at all today? 03:09:52
10 A. No. No, I'm not, except for writing for 03:09:56
11 Hustler. 03:09:59
12 I -- one of the articles I submitted to 03:09:59
13 Hustler was an article on 3-D pornography on-line. 03:10:02
14 Q. Did you talk to anyone at Hustler about your 03:10:20
15 appearance here today? 03:10:23
16 A. Nope. 03:10:25
17 Q. Have you ever talked to anybody about your 03:10:28
18 testimony in this case at Hustler? 03:10:30
19 A. Nope. 03:10:33
20 Q. Never said a word to Ms. Hahner about what -- 03:10:34
21 about what you might have to contribute on behalf of 03:10:38
22 Hustler in this case? 03:10:41
23 A. We -- when I first called her, I told her that 03:10:44
24 I had spoken with Jim Daus on the phone and that I had 03:10:46
25

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1 give testimony for Hustler because he didn't remember it 03:11:59
2 very much? 03:12:02
3 A. Well, I think he was glad that -- 03:12:02
4 Q. Don't tell me what you think. Tell me what he 03:12:06
5 said. 03:12:08
6 A. Well, I don't remember specifically what he 03:12:09
7 said, so I'm telling you what I think he said. 03:12:10
8 Is that all right? 03:12:12
9 I mean, this was a year -- 03:12:15
10 Q. What you recall. 03:12:16
11 A. What I recall. 03:12:17
12 That's what I recall is he said -- 03:12:17
13 You know, I said, "Wow, this case is -- it's 03:12:21
14 really something. This might" -- you know, I don't know if 03:12:23
15 the Supreme Court had denied it then. I said, "Boy, if 03:12:26
16 this thing goes to the Supreme Court, who's going to play 03:12:29
17 -- who's going to play us?" 03:12:30
18 And he's like, "Oh, yeah." He's like, you 03:12:31
19 know, "I don't remember much about it. I'm glad you do." 03:12:33
20 Q. When was the last time you spoke with anyone 03:12:37
21 about your testimony in this case? 03:12:38
22 A. With anyone with Hustler? 03:12:41
23 Q. With anyone associated with Hustler. 03:12:44
24 Lawyers, employees, whomever. 03:12:48
25

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1 read -- I was -- I told her that I was surprised that he 03:10:49
2 was part of this since he had called up and had asked me, 03:10:52
3 you know, what he was entitled to. 03:10:58
4 But, no, I certainly have not had any 03:11:00
5 extensive conversations with anybody. 03:11:03
6 Like I said, Bruce and I have kind of joked 03:11:04
7 around about who -- who is going to play us. Bruce -- 03:11:06
8 Bruce told me, he's like, you know, "I'm glad you remember 03:11:13
9 a lot of this stuff because I don't," is what he told me. 03:11:16
10 Donna -- 03:11:21
11 Q. When did he tell you that? 03:11:22
12 A. When I called -- 03:11:24
13 Well, when did he tell me that. 03:11:26
14 In one of our conversations about submitting 03:11:29
15 to the magazine. 03:11:31
16 Q. In one of your conversations about submitting 03:11:35
17 a piece for payment to Hustler, you talked about this case? 03:11:37
18 A. I said -- at the end of it, I said, "Wow, this 03:11:42
19 case is really -- really something, huh, that we got sued 03:11:44
20 over." 03:11:48
21 And he said, "Yeah. I -- I'm glad that you 03:11:49
22 have testimony because I don't really remember that much." 03:11:52
23 That was the extent of the conversation. 03:11:54
24 Q. He was glad that you were going to be able to 03:11:57
25

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1 A. I don't remember. 03:12:55
2 You know, actually I called -- I did call 03:12:56
3 Donna Hahner on a separate -- on a separate incident and I 03:12:58
4 said that the testimony had been delayed again. 03:13:02
5 I said, "Well, it doesn't seem like they're 03:13:09
6 ever going to get me in." 03:13:11
7 Q. Talking about yourself? 03:13:13
8 A. Yeah. 03:13:14
9 Q. Well, who arranged for you to be here today? 03:13:16
10 A. I -- I made the first contact with Hustler. 03:13:18
11 I read about this on Google -- 03:13:24
12 Q. Who did you -- 03:13:26
13 A. I read about this on Google and I said, "Oh, 03:13:27
14 crap, that's my article." 03:13:30
15 And even though I hadn't spoken to anybody for 03:13:32
16 a while, you know, I felt -- I felt a little 03:13:35
17 responsibility, and so I called up Donna Hahner and I said, 03:13:39
18 "I" -- and I offered my assistance. 03:13:41
19 Q. I remember that testimony. 03:13:45
20 Now I'm asking you how you happen to be 03:13:46
21 sitting in that chair today. 03:13:47
22 A. How am I sitting in this chair today? 03:13:50
23 Q. How did you -- how did you know to be here? 03:13:52
24 Who asked you to come and give a deposition? 03:13:54
25

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1 A. The people to your left 03:14:00
2 Q. You talked to Mr. Bauer or Mr. Solomon? 03:14:03
3 A. Yes. 03:14:06
4 Q. Which one? 03:14:08
5 A. Both. I've spoken to both of them. 03:14:09
6 Q. What did they ask you to do? 03:14:12
7 A. They asked me to give testimony. 03:14:14
8 Q. Did they talk -- tell you about what they were
9 going to ask you? 03:14:18
10 A. They told me what to expect as far as the
11 deposition was concerned. 03:14:21
12 Q. In what way? 03:14:26
13 A. That it would be videoconferencing. That I
14 would have to get -- you know, I would have to have some
15 material supplied to me. This (indicating) and -- you
16 know, a copy of the magazine. 03:14:39
17 They said they would ask me about a lot of
18 how -- like how the process works, about how -- like the
19 pagination, how that came into existence, what it meant,
20 that kind of thing. 03:14:56
21 Q. Did they tell you what you might expect in
22 questions from Mrs. Toffoloni's lawyer? 03:15:00
23 A. Not really. They said -- they said that you
24 were going to definitely ask me questions and, you know,
25

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1 last year. 2010. 03:16:18
2 Q. And Mr. Downey -- 03:16:23
3 A. I mean, to be -- to be perfectly honest, I
4 kind of find it -- it's a little insulting. I mean, \$1500
5 is not that much money. 03:16:31
6 Q. He's just -- he's just doing his job,
7 Mr. Downey, and so now let me do mine. 03:16:35
8 A. Okay. 03:16:37
9 Q. You asked Hustler if you could start writing
10 for them again in September or August of 2010? 03:16:40
11 A. That's correct, yeah. Yes. 03:16:44
12 Q. And you -- you remember speaking with me and
13 agreeing to provide an affidavit for use in this case in
14 Hustler's defense back in the spring of 2010, don't you? 03:16:56
15 A. Yes. That's when -- but I believe that we --
16 we spoke in 2009 originally, when I first contacted you -- 03:17:08
17 Q. We did, but -- 03:17:13
18 A. -- yeah. 03:17:14
19 Q. We certainly did. 03:17:15
20 And when it came time for this case to go to
21 summary judgment and it came time for us to ask you to
22 provide testimony under oath, you gave us an affidavit to
23 use in this case, didn't you? 03:17:27
24 A. Yes, I did. 03:17:28
25

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1 were going to have your turn. 03:15:13
2 But as far as, "Hey, if he says this and reply
3 with this," absolutely no. 03:15:19
4 Q. Did they tell you how to answer questions that
5 they might ask you or that I might ask you? 03:15:30
6 A. Absolutely not. 03:15:34
7 Q. Did you talk to anybody else at Hustler or who
8 works for Hustler about your testimony today, other than
9 the people you've mentioned? 03:15:45
10 A. No, sir. 03:15:46
11 MR. DECKER: All right. Thank you. 03:15:50
12 THE WITNESS: Uh-huh. 03:15:51
13 EXAMINATION 03:15:53
14 QUESTIONS BY MR. BAUER: 03:15:54
15 Q. Mr. Downey, Mr. Decker has made a big show
16 about a suggestion that your testimony here is a quid pro
17 quo for your being published in Hustler and getting paid
18 for that. 03:16:05
19 When did you seek to start writing for Hustler
20 Magazine again? 03:16:07
21 To the best of your recollection, give us an
22 exact date. 03:16:11
23 A. I don't have an exact date, but to the best of
24 my recollection, it was probably August or September of
25

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1 Q. And you went and swore an oath that the
2 testimony you provided in that affidavit was true? 03:17:30
3 A. Yes. 03:17:37
4 Q. Do you remember that? 03:17:37
5 A. Yes. 03:17:38
6 Q. You did it in front of a notary public? 03:17:38
7 A. Yes. 03:17:40
8 Q. And I'm sorry you don't have a copy of your
9 affidavit in front of you, but I have one here in my hand,
10 so -- 03:17:47
11 Oh, and that was in July of 2010 when you
12 finalized that affidavit for us. Do you remember that? 03:17:53
13 A. Yes. 03:17:55
14 Q. In July of 2010, you swore under oath that
15 shortly after Ms. Benoit was murdered, Mr. Samansky
16 contacted the LFP offices offering to sell information
17 about Ms. Benoit's early career ambitions to be a nude
18 model and images of her first and only known efforts to
19 pursue those ambitions. 03:18:16
20 That was true? 03:18:18
21 A. That is true. 03:18:19
22 Q. And that's consistent with what you testified
23 today to this jury? 03:18:26
24 A. I think so, yes. 03:18:26
25

1 Q. And you also testified in your affidavit that 03:18:27
 2 after discussing the matter with your then-boss and Hustler 03:18:29
 3 Magazine editorial director, Bruce David, you pursued the 03:18:32
 4 story and images for inclusion in a future issue of Hustler 03:18:35
 5 Magazine. 03:18:38
 6 That was true then and is consistent with what 03:18:39
 7 you told the jury today? 03:18:41
 8 A. Correct, yes. 03:18:42
 9 Q. You also told us then, in July of 2010, under 03:18:43
 10 oath, that LFP was interested in publishing the story about 03:18:47
 11 Ms. Benoit and her early efforts to pursue a nude modeling 03:18:50
 12 career, and the related images, because of her celebrity 03:18:55
 13 status, the recent and substantial interest in the 03:18:58
 14 high-profile circumstances of her murder, and because no 03:19:01
 15 other media outlet had ever reported on that unique aspect 03:19:05
 16 of her life and career. 03:19:08
 17 That's what you told us in July 2010 under 03:19:10
 18 oath? 03:19:12
 19 A. Yes. 03:19:13
 20 Q. And that's what you told us today, didn't you? 03:19:13
 21 A. Yes. 03:19:15
 22 Q. You also told us that you didn't -- in July 03:19:16
 23 2010 that you didn't believe LFP would have published the 03:19:19
 24 images of Ms. Benoit, had they not illustrated and been 03:19:22
 25

1 selling to Hustler Magazine. 03:20:31
 2 That's what you told us in July 2010 under 03:20:33
 3 oath; that's what you told the jury today. Correct? 03:20:35
 4 A. Correct. 03:20:38
 5 Q. Okay. Thank you. 03:20:40
 6 MR. DECKER: I'd ask you -- 03:20:43
 7 MR. BAUER: I'm not done, Rick. 03:20:44
 8 Q. (By Mr. Bauer) Mr. Decker also asked you 03:20:46
 9 about some text in the article that you wrote. 03:20:47
 10 If you'd pick the magazine back up and look at 03:20:51
 11 Page 40, he asked you specifically about the quote -- the 03:20:54
 12 sentence, "While the original print negatives were 03:20:58
 13 destroyed at Nancy's behest, the video from which these 03:21:01
 14 images were taken survived." 03:21:04
 15 A. Yes. 03:21:06
 16 Q. You wrote that because that's what Mark 03:21:07
 17 Samansky told you, is that right? 03:21:10
 18 A. Yes. That -- you know, basically all of this 03:21:12
 19 is based on Mark Samansky's interview with me. 03:21:14
 20 Q. And you didn't seek to investigate whether 03:21:20
 21 that fact was true, did you? 03:21:22
 22 A. No, I did not. 03:21:25
 23 Q. You don't know whether Samansky was telling 03:21:26
 24 you the truth or not? 03:21:27
 25

1 accompanied by a nude[sic] story, with exclusive or otherwise 03:19:26
 2 notable information about her life and career. 03:19:29
 3 That was true then and that's what you told us 03:19:31
 4 today? 03:19:32
 5 A. Yes. 03:19:33
 6 Q. You also told us in July of 2010, under oath, 03:19:35
 7 that at the time Hustler made the decision to publish the 03:19:39
 8 story and images of Ms. Benoit, and after discussing the 03:19:42
 9 matter with Mr. David and counsel for Hustler, that you 03:19:45
 10 believed then that Hustler had the legal right to publish 03:19:48
 11 the story and the images without seeking permission from 03:19:51
 12 the estate of Ms. Benoit. 03:19:53
 13 That was true then and that's what you told 03:19:55
 14 the jury today? 03:19:57
 15 A. Correct. 03:19:58
 16 Q. And you also told us in your July 2010 03:20:02
 17 affidavit that when the preview for the article about and 03:20:05
 18 the images of Ms. Benoit was published in the February 2008 03:20:08
 19 issue of Hustler Magazine, Jim Daus contacted Hustler by 03:20:12
 20 telephone, spoke to you, inquired about whether the images 03:20:16
 21 included images of himself, he asked you whether he was 03:20:21
 22 entitled to any payment from Hustler for the images that 03:20:24
 23 would be published, and he also told you that he had 03:20:26
 24 additional nude images of Ms. Benoit that he would consider 03:20:29
 25

1 A. That's just what he -- that's just what Mark 03:21:29
 2 Samansky told me. 03:21:31
 3 Q. And for all you know, Samansky was trying to 03:21:33
 4 improve the story he was trying to sell to Hustler 03:21:37
 5 Magazine? 03:21:39
 6 A. I don't know. I -- to be honest, I don't 03:21:41
 7 really feel comfortable guessing what Mark Samansky was 03:21:44
 8 thinking at the time. 03:21:47
 9 Q. Let me ask you: Mr. Decker also asked you 03:21:48
 10 about whether you knew about his letter of the middle of 03:21:54
 11 January 2008 that he sent to Hustler Magazine -- 03:21:58
 12 A. Right. 03:21:59
 13 Q. -- about the images to be published. 03:22:02
 14 Now, your article and the images of Ms. Benoit 03:22:04
 15 were published in the March 2008 issue of Hustler 03:22:08
 16 Magazine -- 03:22:10
 17 A. Correct. 03:22:11
 18 Q. -- right? 03:22:11
 19 A. Correct. 03:22:12
 20 Q. Do you know when that magazine actually hit 03:22:13
 21 the newsstands? 03:22:14
 22 A. Gosh, our lead times were so messed up. 03:22:19
 23 I'm going to -- I'm probably -- and this is 03:22:24
 24 just a guess based on my experience. I would say that it 03:22:26
 25

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1 probably hit the stands in January or December. 03:22:29
2 Q. That would be before Mr. Decker's so-called 03:22:33
3 January 16th letter to Hustler Magazine that he wanted to 03:22:37
4 know if you knew about? 03:22:41
5 A. Right. I mean, the -- 03:22:43
6 Q. Right? 03:22:44
7 A. -- the dates on the actual magazines are not 03:22:45
8 at all consistent when -- when -- when we were actually 03:22:47
9 writing the magazine and when it comes out on stands. 03:22:50
10 Q. Now, Mr. Decker made a show about disagreeing 03:22:54
11 with your opinion about whether Hustler had the legal right 03:22:58
12 to publish these images because they were part of a 03:23:03
13 newsworthy story, said "You're not a lawyer" -- 03:23:06
14 A. Uh-huh. 03:23:09
15 Q. -- said "You haven't been to law school and 03:23:10
16 you're not trained as a lawyer," right? 03:23:11
17 A. That's correct. I'm not a lawyer. 03:23:13
18 Q. And then he asked you: During the period 03:23:17
19 between the time he sent the letter, January 16th, and the 03:23:20
20 time you left Hustler at the end of February 2008, during 03:23:23
21 that time period he asked you, quote, had you -- he said 03:23:26
22 you heard nothing about any efforts to mitigate the damages 03:23:30
23 to Ms. Toffoloni by publication. 03:23:35
24 Do you remember that? 03:23:37
25

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1 you were wrong when you decided that Hustler had the legal 03:24:41
2 right to publish these images. 03:24:44
3 He didn't tell you, before he asked that 03:24:46
4 question, that our trial judge thought you were right too. 03:24:48
5 He didn't tell you that before he asked that 03:24:51
6 question, did he? 03:24:53
7 A. No. No, he didn't tell me that. 03:24:54
8 MR. BAUER: That's all I have. 03:24:59
9 EXAMINATION 03:25:00
10 QUESTIONS BY MR. DECKER: 03:25:01
11 Q. Let me make sure I've got the chronology down 03:25:01
12 here right, Mr. Downey. 03:25:04
13 A. Sure. 03:25:05
14 Q. You quit or were terminated in February of 03:25:06
15 2008? 03:25:08
16 A. Yes. 03:25:09
17 Q. Right? 03:25:10
18 A. Yes. 03:25:10
19 Q. You then saw news about the lawsuit against 03:25:11
20 Hustler Magazine? 03:25:14
21 A. Yes. 03:25:16
22 Q. Right? 03:25:17
23 A. Yes. 03:25:17
24 Q. Then you called Hustler Magazine and said, 03:25:19
25

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1 A. Yes. 03:23:37
2 Q. Well, during that period of time between 03:23:40
3 January 16th, 2008, and the time you left Hustler at the 03:23:44
4 end of February 2008 -- 03:23:47
5 A. Okay. 03:23:48
6 Q. -- did you hear anything about this trial 03:23:49
7 judge, Judge Thrash, who is sitting here in front of the 03:23:52
8 jury today, telling Ms. Toffoloni that Hustler did not have 03:23:55
9 to stop publishing this magazine? 03:24:00
10 A. I had -- no. 03:24:04
11 Q. Did you hear anything about that? No? 03:24:05
12 A. No. No. 03:24:07
13 Q. After you left Hustler, did you hear anything 03:24:08
14 about Judge Thrash's decision, consistent with your 03:24:09
15 understanding, that Hustler did have the legal right to 03:24:13
16 publish these images as part of a news story? 03:24:16
17 Did you hear about that? 03:24:18
18 A. No. 03:24:19
19 Like I said, I wasn't even familiar with this 03:24:20
20 case. The first I ever heard about this case was in 2009. 03:24:23
21 Like I said, I didn't speak to anybody from 03:24:29
22 Hustler from when I left until I called Donna Hahner in 03:24:32
23 2009. 03:24:35
24 Q. And Mr. Decker asked you if you now know that 03:24:37
25

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1 "Hey, I may be able to help in this case," right? 03:25:21
2 A. That's correct. 03:25:25
3 Q. And then since then, you have had three 03:25:26
4 articles submitted to Hustler Magazine, one of which they 03:25:29
5 paid you \$1500 for, with more money to come for the other 03:25:32
6 two articles. 03:25:37
7 Is that chronology correct? 03:25:38
8 A. That chronology is correct. 03:25:40
9 And I mean, you're really fishing with this, 03:25:42
10 because it has -- it's -- it's no way related to each 03:25:43
11 other. 03:25:47
12 But we'll let the jury decide. I know. 03:25:49
13 MR. DECKER: That's all. 03:25:54
14 EXAMINATION 03:15:53
15 QUESTIONS BY MR. BAUER: 03:15:54
16 Q. Mr. Downey, we don't have to. You can tell
17 them. 03:25:56
18 A. Okay. 03:25:57
19 Q. You called in order to help because it was 03:25:58
20 your article that was the subject of this lawsuit, is that 03:25:59
21 right? 03:26:01
22 A. I called and offered to help for a couple 03:26:01
23 different reasons. 03:26:03
24 (a), it was my article. I felt responsible 03:26:04
25

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1 for it. 03:26:06
2 (b), as a writer, I think it's ridiculous 03:26:07
3 that -- that this case has turned out the way it has been. 03:26:08
4 And (c), before I met Bruce David and Donna 03:26:12
5 Hahner and Hustler Magazine, I was writing screenplays and 03:26:15
6 working at a tanning salon, and no matter how it ended up 03:26:17
7 or how I left, you know, I'll always be grateful to those 03:26:21
8 people and that organization. 03:26:25
9 I mean, I can tell people I'm a published 03:26:26
10 author now because of those people. 03:26:28
11 That's why I offered to help. 03:26:29
12 MR. BAUER: Thanks. We're done. 03:26:33
13 THE REPORTER: This is the reporter. 03:26:36
14 May I ask for orders on the record, please? 03:26:39
15 MR. BAUER: I'm sorry. What was that? 03:26:44
16 THE REPORTER: This is the reporter. 03:26:45
17 May I ask for orders on the record? 03:26:50
18 MR. BAUER: Orders on the record. 03:26:51
19 MR. DECKER: Don't know what you mean. 03:26:52
20 THE REPORTER: Would you like to order the 03:26:55
21 transcript? 03:26:56
22 MR. BAUER: Yes, absolutely. 03:26:58
23 We want video, we want transcript. Expedited, 03:26:59
24 please. 03:27:02
25

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1 CERTIFICATE OF REPORTER
2 STATE OF MISSOURI)
3) ss.
4 CITY OF KANSAS CITY)
5 I, Charles W. Motter, Missouri CCR No. 617,
6 RDR, CCR, do hereby certify that the witness whose
7 testimony appears in the foregoing deposition was duly
8 sworn by me; that the testimony of said witness was taken
9 by me to the best of my ability and thereafter reduced to
10 typewriting under my direction; that I am neither counsel
11 for, related to, nor employed by any of the parties to the
12 action in which this deposition was taken, and further that
13 I am not a relative or employee of any attorney or counsel
14 employed by the parties thereto, nor financially or
15 otherwise interested in the outcome of the action.
16
17 _____
18 Certified Court Reporter
19
20
21
22
23
24
25

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1 THE REPORTER: And when would you like it 03:27:04
2 delivered? 03:27:05
3 MR. BAUER: As soon as possible. 03:27:07
4 MR. DECKER: Yeah. This is Decker. I just 03:27:08
5 want the transcript. Miniscript is fine. 03:27:09
6 THE REPORTER: And may we deliver yours, 03:27:15
7 Mr. Bauer, by e-mail? 03:27:17
8 MR. BAUER: Yes. But you're going to send us 03:27:19
9 a DVD too, I assume. 03:27:21
10 THE REPORTER: Yes. I'm talking the 03:27:24
11 transcript. I'm sorry. 03:27:24
12 MR. BAUER: Correct. Okay. Yes, please do. 03:27:26
13 THE REPORTER: Thank you. 03:27:28
14 THE VIDEOGRAPHER: The time is 3:27. We are 03:27:30
15 off the record. 03:27:31
16 (Downey Exhibit 1 marked for identification by
17 the reporter.)
18 (Deposition concluded at 3:27 p.m.)
19
20
21
22
23
24
25

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1
2
3
4
5 April 22, 2011
6 Mr. Tyler Downey
7 301 E. 70th Terrace
8 Kansas City, MO 64113
9 In Re: Maureen Toffoloni, as Administrator and Personal
10 Representative of the Estate of Nancy E. Benoit v.
11 LFP Publishing Group, LLC, d/b/a Hustler Magazine,
12 et al.
13
14 Dear Mr. Downey:
15 Your transcript is available at this time for Read & Sign.
16 You may contact our office to make arrangements
17 to do so at your convenience.
18 Please be advised that the deponent has 30 days from the
19 date of receipt of this letter to review and make any changes
20 on the Errata sheet that is included in the back of
21 the transcript.
22
23 Thank you for your attention to this matter.
24
25 Sincerely,
TSG Reporting
Enclosures
cc: Mr. S. Derek Bauer
Mr. Richard Decker

1 STATE OF)
2) ss.
3 COUNTY OF)
4

5 I, TYLER DOWNEY, do hereby certify:

6 That I have read the foregoing deposition;
7 That I have made such changes in form and/or
8 substance to the within deposition as might be necessary to
9 render the same true and correct;

10 That having made such changes thereon, I hereby
11 subscribe my name to the deposition.

12 I declare under penalty of perjury that the
13 foregoing is true and correct.

14 _____
15 TYLER DOWNEY

16 Executed this day of , 20 ,

17 at County,

18 _____
19 Notary Public

20 My Commission Expires:

21 Signature page to: Mr. Tyler Downey, 301 E. 70th Terrace,
22 Kansas City, MO 64113

23 CM/TYLER DOWNEY, April 21, 2011

24 Re: Maureen Toffoloni, as Administrator and Personal
25 Representative of the Estate of Nancy E. Benoit v. LFP
Publishing Group, LLC, d/b/a Hustler Magazine, et al.

1 Witness Errata Sheet

2 Witness: TYLER DOWNEY

3 Re: Maureen Toffoloni, as Administrator and Personal
4 Representative of the Estate of Nancy E. Benoit v. LFP
5 Publishing Group, LLC, d/b/a Hustler Magazine, et al.

6 Date Taken: April 21, 2011

7 Upon reading the deposition and before subscribing thereto,
8 the deponent indicated the following changes should be
9 made:

10 Page Line Should read:

11 Reason assigned for change :

12 Page Line Should read:

13 Reason assigned for change :

14 Page Line Should read:

15 Reason assigned for change :

16 Page Line Should read:

17 Reason assigned for change :

18 Page Line Should read:

19 Reason assigned for change :

20 Page Line Should read:

21 Reason assigned for change :

22 Page Line Should read:

23 Reason assigned for change :

24 Page Line Should read:

25 Reason assigned for change :

Witness Signature:

A	
ability (1) 96:8	advised (1) 97:14
able (3) 15:17 79:24 93:1	affairs (1) 74:8
absolutely (12) 17:14 33:6 39:22 48:23 49:3 52:24 55:6,13 70:17 83:3 83:6 94:22	affidavit (7) 84:13,22 85:2,9,12 86:1 87:17
accept (1) 47:17	afternoon (3) 3:12,12 5:2
accepted (1) 48:9	age (1) 6:13
accident (1) 19:6	agree (6) 27:24 57:10,13,14 58:2 65:22
accommodate (1) 6:24	agreeable (1) 28:1
accompanied (1) 87:1	agreed (5) 6:4 28:20 42:22 49:21 49:21
accompany (2) 40:19,19	agreeing (1) 84:13
accompanying (1) 38:1	ahead (2) 7:6 22:14
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