

EXHIBIT C

1 chance to finish your question.

2 MS. HAMILTON: But you know what, if I want a
3 chance to finish my question or if I need the
4 witness to wait, I'll --

5 MR. HANNAFAN: If you don't want my help, say
6 so.

7 MS. HAMILTON: I don't want your help. Thank
8 you, Mike.

9 MR. HANNAFAN: Then you won't get it.

10 MS. HAMILTON: Could you read the question
11 back?

12 (WHEREUPON, the record was
13 read by the reporter.)

14 BY THE WITNESS:

15 A. Did I keep a copy for myself? Yes.

16 BY MS. HAMILTON:

17 Q. Did you provide a copy for anyone else?

18 A. No.

19 Q. When did you first learn that the
20 statement in the letter might be inaccurate?

21 A. I believe it was last February. I was
22 in Florida. I got a phone call from --

23 MR. CONWAY: Wait, wait.

24 MR. HANNAFAN: Bill, you've answered the

1 question. She asked you when.

2 MR. CONWAY: You're getting into privileged
3 issues here.

4 MR. HANNAFAN: You have to give him a chance
5 to object --

6 BY THE WITNESS:

7 A. February of last year.

8 BY MS. HAMILTON:

9 Q. And how did you --

10 MR. HANNAFAN: '06 or '05?

11 BY THE WITNESS:

12 A. '06.

13 MR. HANNAFAN: This year?

14 BY THE WITNESS:

15 A. This year.

16 MR. HANNAFAN: February of '06?

17 BY THE WITNESS:

18 A. Correct.

19 BY MS. HAMILTON:

20 Q. How did you learn that?

21 MR. CONWAY: How? I'm concerned you're
22 getting into a privileged area here. So is your
23 question who did he have that conversation with?

24 MS. HAMILTON: Right.

1 MR. CONWAY: Okay. So that's the question,
2 who did you have a conversation with.

3 BY THE WITNESS:

4 A. I had a conversation --

5 MR. CONWAY: And just identify the person
6 and --

7 BY THE WITNESS:

8 A. Mr. Bergen and Mr. Conlon.

9 BY MS. HAMILTON:

10 Q. What was said during the conversation?

11 MR. CONWAY: I'll object.

12 BY THE WITNESS:

13 A. What?

14 BY MS. HAMILTON:

15 Q. What was said in the conversation?

16 MR. CONWAY: I'll object on the grounds of
17 privilege.

18 MR. HANNAFAN: He's making an objection on
19 the grounds of privilege. So I'm going to
20 instruct you not to answer that. And if counsel
21 for the EEOC disagrees, then they will have to
22 seek a ruling from Judge Zagel. You should not
23 answer it now unless --

24 THE WITNESS: I won't.

1 MR. HANNAFAN: -- unless you're told
2 otherwise by -- possibly by the Court.

3 BY MS. HAMILTON:

4 Q. Other than any conversation in which
5 Mr. Conlon participated, did you and Mr. Bergen
6 have any discussion regarding the letter?

7 A. No.

8 Q. Other than that conversation in
9 February with Mr. Bergen and Mr. Conlon, did you
10 have any discussion with anyone about the letter
11 other than your attorney, Mr. Hannafan?

12 MR. HANNAFAN: That's yes or no.

13 BY THE WITNESS:

14 A. No.

15 BY MS. HAMILTON:

16 Q. Why do you recall the circumstances
17 that led to the drafting of this letter?

18 MR. CONWAY: Object to the form.

19 THE WITNESS: Can I answer that?

20 MR. CONWAY: Yes.

21 BY THE WITNESS:

22 A. Basically, if you look at the bottom of
23 the letter in the fine print --

24 MR. HANNAFAN: Bottom left-hand corner.