

EXHIBIT-G Brady

EXCERPT OF BRIAN BRADY DEPOSITION TRANSCRIPT - JUNE 15, 2009

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5 Q And you say, "And, we wrote a unexpected number of
6 orders."

7 How many orders did you write?

8 A Six.

9 Maybe ten.

10 Q So, there were actual documents, Purchase-Orders
11 created.

12 Right?

13 A I didn't say that.

14 Q Well, if you write "orders" how do you it if you're not
15 writing it out to them?

16 A Well, again, that's the length of time that we use at
17 Heartland.

18 If a dealer orders two units we call it -- if a --
19 let's say with the Eagle Ridge, for example.

20 If a dealer, an existing Heartland dealer, said,
21 "I'll take two Eagle Ridges."

22 We sign that dealer, and wrote two orders.

23 Q Okay.

24 And, that shows up in the Daily Sales Log, doesn't
25 it?

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1 A It would eventually show up in the Daily Sales Log when
2 the Purchase-Orders were actually written.

3 And, those orders could have been written at that
4 time.

5 Or they may have been written -- or the Sales
6 Order may have been written that day.

7 It may have been a week later.

8 Q Okay.

9 A It may have been -- it may have been a month later at
10 the Louisville Show.

11 Q Okay.

12 Well, at the time you wrote this letter, the
13 October 28, what were the total number of trailers,
14 5th-wheel or travel-trailers --

15 A Right.

16 Q (Continuing) -- that you were referring to by this
17 "unexpected number of orders"?
18 A I don't recall the number.
19 It wasn't a large number.
20 But, it was unexpected in the sense that, again,
21 let's go back and look at that time of year.
22 One: You were maybe a month away from the
23 Louisville Show.
24 So, typically in any year, dealers aren't buying a
25 lot of product prior to the Louisville Show.

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1 Second of all: You had an economic melt-down.
2 Maybe the worst economic crisis in the United
3 States since the Great Depression.
4 So, to be honest with you: We didn't expect to
5 write anything.
6 We expected to show some products.
7 Maybe attract a dealer's interest to come back at
8 the Louisville Show.
9 So, for a dealer to -- for us to write six, eight,
10 ten orders, that would have been "pleasantly surprising
11 and unexpected."
12 Because we didn't expect to write anybody.
13 Q So, the unexpected number of orders would be on the
14 nature of ten or so?
15 A Maybe.
16 Q Would it be larger?
17 A No.
18 Q If you wanted to know for sure, how would you find out?
19 A I would ask Tim Hoffman to go back and try to research
20 that, the records.
21 Q Which records would he have to look at?
22 A Whatever Sales-records they keep.
23 I'm not quite sure how they log those orders.
24 And, keep in mind, as I've indicated: Those --
25 and we say "write an order" that could have been a

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1 commitment if a dealer says, "I'm going to take two."
2 That's fine. Those orders may, again, have been
3 written at that time, may have been written ten days
4 later.