

EXHIBIT Y5

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 _____

4)

5 EQUAL EMPLOYMENT OPPORTUNITY)

6 COMMISSION,)

7 Plaintiff,)

8)

9 v.) Civil Action No.:

10) 8:07-CV-02612

11 BLOCKBUSTER INC.,)

12 Defendant.)

13 _____)

14
15 DEPOSITION OF LAQUANTA BRINSON

16 Raleigh, North Carolina

17 Monday, September 8th, 2008

18 10:00 a.m.

19
20 Job No.: 24-136236

21 Pages: 1 - 69

22 Reported by: Vivian Marino, RPR

1 A. Piggly Wiggly.

2 Q. Piggly Wiggly?

3 A. Yes.

4 Q. Is that here in North Carolina?

5 A. Yes, it was.

6 Q. Was that during high school or between high
7 school and the Navy?

8 A. During high school.

9 Q. During high school. So after you graduated high
10 school you went to the Navy?

11 A. Yes.

12 Q. Have you ever been self-employed?

13 A. No, I have not.

14 Q. When did you begin working for Express Personnel?

15 A. Don't quote me, but I believe around January of
16 2005.

17 Q. And did you fill out an application?

18 A. Yes.

19 Q. And you said while you were working at U.S.
20 Security that was at the Blockbuster facility, correct?

21 A. Correct.

22 Q. Is that the Gaithersburg facility?

1 A. Yes, ma'am.

2 Q. And how did you hear about the position?

3 A. Well, just being in the same building and they
4 looked as though they needed help.

5 Q. And did you continue working at U.S. Security, or
6 did you resign and then start working at Blockbuster?

7 A. I resigned.

8 Q. Did you have an interview for Express Personnel?
9 Did someone interview you for the position?

10 A. Yes.

11 Q. Do you remember who that was?

12 A. I know it was a common name, but I don't remember
13 her name.

14 Q. If I said Cynthia Brown would that jog your
15 memory?

16 A. Yes.

17 Q. And is Ms. Brown the person who made the decision
18 to hire you?

19 A. Yes.

20 Q. What position were you hired for?

21 A. I don't remember the technical term.

22 Q. What were your job duties?

1 A. Mid February.

2 Q. And how did it end? Were you terminated? Were
3 you -- did you quit?

4 A. Yes, I did.

5 Q. You quit?

6 A. Uh-huh, yes.

7 Q. Did you ever go back to working for Express
8 Personnel after that?

9 A. No.

10 Q. Did you file an EEOC charge about your employment
11 there after you quit?

12 A. No.

13 Q. Why not?

14 A. I mean I felt like it was done and over.

15 Q. Did anyone suggest to you that you contact the
16 EEOC or the Maryland Commission on Human Rights?

17 A. No, ma'am.

18 Q. While you were there, do you feel you were
19 sexually harassed?

20 A. Yes.

21 Q. Who do you think sexually harassed you?

22 A. Taj.

1 Q. And when he made the sexual comments to you, did
2 he say this in front of other people?

3 A. Sometimes, yes.

4 Q. Who were those people?

5 A. I apologize, but I don't remember.

6 Q. And did he also say these things to you when you
7 were alone?

8 A. On a couple of occasions, yes.

9 Q. And where were you in the facility when he made
10 those comments?

11 A. At my station.

12 Q. Could you describe your station for me?

13 A. It was like a long table similar to this one, and
14 I was sitting on the far end and the next person was
15 sitting beside me and continue on down.

16 Q. And when he made comments when you were alone,
17 where were those made?

18 A. Maybe in the lunchroom or outside smoking.

19 Q. And you said he made gestures towards you that
20 you felt were sexually harassing?

21 A. Yes, he put his arm around me; brushed his body
22 up against mine.

1 Q. How often did he put his arms around you?

2 A. Probably once a day.

3 Q. And did he put his arm around your shoulders,
4 around your waist? Where did he put his arm?

5 A. Generally around my shoulder but his hand would
6 hang like right in front of my breast.

7 Q. Did he ever touch your breast?

8 A. Yes.

9 Q. And when he brushed up against you, where did --
10 how did he do that?

11 A. Like just would slide in front of me or behind
12 me.

13 Q. And how often would he brush up against you?

14 A. Several times a week he would try.

15 Q. When Taj made sexual comments to you, what would
16 you say to him?

17 A. Man, go ahead. Stop playing. It's not funny.

18 Q. And would he say anything back to you?

19 A. You know you want it; you just haven't met the
20 right man; things of that nature.

21 Q. Do you remember any of the dates that he touched
22 you?

1 Q. Did anyone else?

2 A. Linc Barrett a couple of times.

3 Q. How often did that happen?

4 MR. PHILLIPS: Asked and answered.

5 You can answer again.

6 THE WITNESS: On a daily basis.

7 BY MS. KEILLER:

8 Q. Did anyone make threats against you?

9 A. Yes.

10 Q. Who?

11 A. Taj.

12 Q. Did anyone else make threats towards you?

13 A. Not that I can think of.

14 Q. And what were those threats other than the
15 threats you've already told us about, about fighting you
16 like a man?

17 MR. PHILLIPS: Objection. Assumes facts.

18 Answer. You can go ahead and answer.

19 THE WITNESS: Just he said he was going to
20 beat my ass and make me want to go back to a man.

21 BY MS. KEILLER:

22 Q. Did he say anything else?

1 you?

2 A. Yes.

3 Q. Who were those people?

4 A. I don't actually recall the people's names, or I
5 can't even picture their face, but I'm assuming those
6 individuals that did give in to gestures made by Taj.

7 Q. Do you think the African American employees were
8 treated more favorably than you -- the other African
9 American employees?

10 A. Some of them, yes.

11 Q. Were those all female employees?

12 A. No.

13 Q. Why do you think they were treated more favorably
14 than you?

15 A. In my opinion?

16 Q. Yes.

17 A. 'Cause they kissed ass.

18 Q. Did you ever feel like the Hispanic employees
19 were treated more favorably than you?

20 A. No.

21 Q. Were you ever assigned to monitor the Hispanic
22 employees? Did anyone ever tell you to watch them?

1 A. It wasn't a specific group to watch. No, they
2 didn't assign me to that, no.

3 Q. Do you know if anyone was ever assigned to watch?

4 A. Yes.

5 Q. And who was assigned to watch employees?

6 A. I can't recall her name, but she was an African
7 American female. And like I said, it didn't appear as
8 though it was a specific group. It was -- appeared as
9 though it was specific people that weren't doing their
10 quote unquote job.

11 Q. How did you know that this woman was assigned to
12 monitor people who weren't doing their jobs?

13 A. Because I heard when it was told to her.

14 Q. And where were you when you heard this?

15 A. Walking past.

16 Q. Were you -- where were you walking past? Was it
17 the lunchroom? Was it the floor?

18 A. The floor.

19 Q. And who was telling her to watch employees?

20 A. I honestly don't remember which group of -- which
21 member of management that was.

22 Q. How long were your lunch breaks?

WITNESS'S CERTIFICATE

I, LaQUANTA BRINSON, do hereby certify
that I have read and understand the foregoing
transcript and believe it to be a true, accurate, and
complete transcript of my testimony, subject to
the attached list of changes, if any.

LaQUANTA BRINSON

This deposition was signed in my presence by
_____, on the _____ day of
_____, 2008.

Notary Public

My commission expires: