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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

EQUAL EMPLOYMENT OPPORTUNITY : CIVIL ACTION NO.:

COMMISSION, : 8:07-CV-02612

Plaintiff, :

v. :

BLOCKBUSTER, INC., :

Defendant. :

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Deposition of NI'EMA FIELDS

Washington, D.C.

Friday, October 24, 2008

11:00 a.m.

Job No: 1-140563

Pages 1 - 84

Reported by: Susan Ingram, RPR

<p style="text-align: right;">Page 21</p> <p>1 A No.</p> <p>2 Q Were you hired over the phone?</p> <p>3 A Yes.</p> <p>4 Q Do you remember who you spoke with?</p> <p>5 A No.</p> <p>6 Q What position were you hired for?</p> <p>7 A Warehouse worker.</p> <p>8 Q How long was it between when you got hired</p> <p>9 and when you started your assignment at Blockbuster?</p> <p>10 A I got, well, the next day.</p> <p>11 Q And you said you filled out an application</p> <p>12 after you were already hired?</p> <p>13 A Yes.</p> <p>14 Q Did you turn in a résumé?</p> <p>15 A I don't think so. I might have -- I'm not</p> <p>16 sure. I don't remember.</p> <p>17 Q So, tell me how that worked. Did you call</p> <p>18 into Express or how did the process of getting hired</p> <p>19 work?</p> <p>20 A My brother referred me for the job. He say</p> <p>21 they was looking for a lot of new workers. So I believe</p> <p>22 they called me -- I might have sent them my résumé and</p>	<p style="text-align: right;">Page 23</p> <p>1 Q I'm going to hand you --</p> <p>2 (Exhibit 2 marked for identification.)</p> <p>3 I'll give you a moment to look through the</p> <p>4 document.</p> <p>5 MR. PHILLIPS: Just to see if you recognize</p> <p>6 it.</p> <p>7 A (Witness examines document.)</p> <p>8 Q Do you recognize this document?</p> <p>9 A Yes.</p> <p>10 Q Did you receive a copy of this when you began</p> <p>11 your employment with Express?</p> <p>12 A It wasn't like this, but yes.</p> <p>13 Q What is this document?</p> <p>14 A The orientation package, what's in the</p> <p>15 orientation package, the little book that they gave us.</p> <p>16 Q If you could turn to EEOC 00169, those little</p> <p>17 numbers. It's about the fifth page back. At the top of</p> <p>18 the page, I'd like to direct your attention to the top</p> <p>19 of the page. Have you seen this policy before?</p> <p>20 A I mean, yeah, I read it.</p> <p>21 Q Did anyone at all go over this policy with</p> <p>22 you when you began your employment?</p>
<p style="text-align: right;">Page 22</p> <p>1 they called me, and she told me to go in the day before</p> <p>2 Thanksgiving. Or was it the day after Thanksgiving? It</p> <p>3 was the day before -- no, the day after Thanksgiving I</p> <p>4 was to start. So I went to work the day after</p> <p>5 Thanksgiving.</p> <p>6 Q Did you have an orientation that day, the</p> <p>7 first day you went in?</p> <p>8 A Maybe -- did she come that day? I believe</p> <p>9 so, yes.</p> <p>10 Q And what was your orientation?</p> <p>11 A The lady from the agency came to Blockbuster</p> <p>12 and we filled out all the paperwork and she gave us the</p> <p>13 little package, the Express package.</p> <p>14 Q Do you remember what was in the Express</p> <p>15 package?</p> <p>16 A Timecard, um, I mean, I don't know. I really</p> <p>17 can't say for sure I remember everything that was in</p> <p>18 that package because it was years ago. I can't say I</p> <p>19 know what was in that package, but I know my timecards</p> <p>20 was in there. But it was some other paperwork, too.</p> <p>21 Q Did she go over any policies with you?</p> <p>22 A No.</p>	<p style="text-align: right;">Page 24</p> <p>1 A No.</p> <p>2 Q Was the Blockbuster assignment your only</p> <p>3 assignment from Express Personnel?</p> <p>4 A Then?</p> <p>5 Q Yes.</p> <p>6 A Yes.</p> <p>7 Q Did Express Personnel assign you to any other</p> <p>8 assignments after the Blockbuster assignment?</p> <p>9 A No.</p> <p>10 Q What were your job duties at the Blockbuster</p> <p>11 assignment?</p> <p>12 A Take care of packages. When the DVD movies</p> <p>13 come in, the new movies came in, I checked them in. I</p> <p>14 wiped the DVD movies off in the morning time and then</p> <p>15 put them back on the -- well, we put them -- we put them</p> <p>16 somewhere. We wiped them off and we put the movies to</p> <p>17 another table to check them in.</p> <p>18 Q Are there any other duties other than those</p> <p>19 that you just described?</p> <p>20 A That's it.</p> <p>21 Q How much were you paid?</p> <p>22 A Ten dollars an hour.</p>

<p style="text-align: right;">Page 25</p> <p>1 Q Did you receive a check or direct deposit?</p> <p>2 A Direct deposit.</p> <p>3 Q What were your work hours when you began?</p> <p>4 A We had to be there 6:00 in the morning until</p> <p>5 we finished.</p> <p>6 Q Did you receive any benefits?</p> <p>7 A No.</p> <p>8 Q And when did your employment with Express</p> <p>9 end?</p> <p>10 A Well, after --</p> <p>11 MR. PHILLIPS: And I'll object to the</p> <p>12 characterization. Misleading.</p> <p>13 Go ahead and answer the question, please.</p> <p>14 A Well, I worked for this Express after</p> <p>15 Blockbuster. I didn't work for that Express anymore</p> <p>16 after Blockbuster.</p> <p>17 Q Did you work for another Express?</p> <p>18 A Yes.</p> <p>19 Q Which Express was that?</p> <p>20 A The one in Virginia. It's in Falls Church,</p> <p>21 Virginia.</p> <p>22 Q When did you begin working for the Express in</p>	<p style="text-align: right;">Page 27</p> <p>1 A Yes.</p> <p>2 Q And where was that?</p> <p>3 A It was at UnitedHealthcare.</p> <p>4 Q When was that?</p> <p>5 A I started there in March, March of -- was it</p> <p>6 '04? I believe March of '04. It was the next year. I</p> <p>7 believe it was March of '04 or March of '05.</p> <p>8 Q Where is UnitedHealthcare located?</p> <p>9 A Rockville, Maryland.</p> <p>10 Q What did you do there?</p> <p>11 A Verified dental benefits.</p> <p>12 Q How much were you paid there?</p> <p>13 A 11 -- I started out with \$11 an hour.</p> <p>14 Q How long did you work there?</p> <p>15 A For six, six months.</p> <p>16 Q What benefits did you receive?</p> <p>17 A I had dental, vision, medical, and I had</p> <p>18 401(k).</p> <p>19 Q Why did you leave UnitedHealthcare?</p> <p>20 A I was a temp there as well.</p> <p>21 Q Were you working through a temp agency?</p> <p>22 A Placement firms.</p>
<p style="text-align: right;">Page 26</p> <p>1 Falls Church?</p> <p>2 A 2007.</p> <p>3 Q What did you do there?</p> <p>4 A Worked at Inova Hospital as a financial</p> <p>5 coordinator.</p> <p>6 Q What were your duties?</p> <p>7 A Verifying medical benefits.</p> <p>8 Q Do you remember what month in 2007 you began?</p> <p>9 A September.</p> <p>10 Q Are you still employed by --</p> <p>11 A No. By Express, no.</p> <p>12 Q Why did you leave your assignment at Inova?</p> <p>13 A I didn't leave the assignment; the assignment</p> <p>14 actually ended. They filled all the positions so they</p> <p>15 didn't need the temps anymore.</p> <p>16 Q When did the assignment end?</p> <p>17 A February of '08.</p> <p>18 Q Back to your employment at Express Personnel</p> <p>19 in Maryland.</p> <p>20 A Uh-huh.</p> <p>21 Q After your employment ended, did you find</p> <p>22 another job?</p>	<p style="text-align: right;">Page 28</p> <p>1 Q How did you find out about the placement --</p> <p>2 A They contacted me.</p> <p>3 Q How did they contact you?</p> <p>4 A My résumé online.</p> <p>5 Q What service did you use online?</p> <p>6 A Well, they found me on Monster.</p> <p>7 Q After you left UnitedHealthcare, what was</p> <p>8 your next position?</p> <p>9 A I worked at Lockheed Martin.</p> <p>10 Q How long did you work at Lockheed?</p> <p>11 A Almost six months.</p> <p>12 Q Were you there through a temp agency also?</p> <p>13 A Yes.</p> <p>14 Q Which agency?</p> <p>15 A Kelly Services.</p> <p>16 Q What was your job title at Lockheed?</p> <p>17 A Call center rep.</p> <p>18 Q How did you find out about the position?</p> <p>19 A They contacted me.</p> <p>20 Q Kelly contacted you?</p> <p>21 A Yes.</p> <p>22 Q And how did they contact you?</p>

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1 A My résumé with CareerBuilder.  
2 Q What was the name of your supervisor there?  
3 A At Kelly Services?  
4 Q Yes.  
5 A Monique. No, it was Monica McIntyre.  
6 Q Which Kelly Services' office did you find the  
7 position through?  
8 A It was in Virginia. I believe Alexandria.  
9 Q And which Lockheed facility did you work at?  
10 A Crystal City.  
11 Q You said you were a call center rep; right?  
12 A Yes.  
13 Q What were your duties?  
14 A I answered the telephone.  
15 Q Did you have any other duties?  
16 A We made templates every two weeks.  
17 Q How much were you paid?  
18 A Sixteen dollars an hour.  
19 Q Did you receive any benefits?  
20 A No.  
21 Q And why did you leave Kelly  
22 Services/Lockheed?

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1 A They -- Lockheed Martin ended my assignment.  
2 Q Why did they end your assignment?  
3 A For using -- sending e-mail, a personal  
4 e-mail from the work computer.  
5 Q And after you left Kelly Services and  
6 Lockheed, what was your next position?  
7 A Nothing. That was it. That was the last  
8 job.  
9 Q Are you currently employed?  
10 A No.  
11 Q Are you looking for work?  
12 A Yes.  
13 Q How are you looking for work? What steps are  
14 you taking to find a position?  
15 A I apply for a lot of jobs online and the  
16 newspaper.  
17 Q Which newspapers do you look at?  
18 A The Washington Post.  
19 Q Do you look at it online or --  
20 A No, the actual paper.  
21 Q What online services do you use?  
22 A Yahoo!, CareerBuilder, Monster, craigslist.

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1 Q Okay. So going back to your job at Express  
2 Personnel in Maryland, when did you leave? You said  
3 December 2005 -- or excuse me, December 2004?  
4 A Yes, I believe it was 2004. I don't really  
5 remember what year it was, so I don't want to say yeah,  
6 but it was December of that year.  
7 Q And why did your assignment with Express end?  
8 A I was fired.  
9 Q How did you find out you were fired?  
10 A I got fired in front of the -- in front of  
11 everybody.  
12 Q Who fired you?  
13 A Taj.  
14 MR. PHILLIPS: For the record, Taj is T-a-j.  
15 Q Is that Thomas Johnson?  
16 A Yes.  
17 Q Why did he say you were fired?  
18 A Um, well, he didn't say a reason right then  
19 and there as to why I was fired; he just made a big  
20 scene in front of everyone and went into the office and  
21 called Express.  
22 Q What did he say in front of everyone?

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1 A He said -- first, he started making it seem  
2 like I wasn't doing my -- wiping the DVDs off correctly.  
3 Then he brought up the fact that I went to Linc and told  
4 Linc that he was sexually harassing me. And when I went  
5 to speak up for myself, he just blew up.  
6 Q What did he say?  
7 A He was just like, You're out here, you're  
8 gone. And I went into the office and he came in there  
9 and called Express and told me that they didn't need me  
10 anymore.  
11 Q Who witnessed him yelling at you?  
12 A Everybody, everybody in the warehouse. We  
13 were all standing at the table wiping the DVD movies  
14 off.  
15 Q Do you remember any names?  
16 A I remember some names but I can't say I  
17 remember their first names and last names.  
18 Q Could you give me the names you remember,  
19 please?  
20 A I remember -- let's see, Taj was there. It  
21 was a manager. His name was Kevis (phonetic). Then it  
22 was -- okay, let me see. I can't say no names but

1 everybody that worked in the warehouse was there.  
 2 Q How many people would you say witnessed,  
 3 approximately?  
 4 A I would say by then, maybe over ten people.  
 5 Q And then you say Taj went to the office or  
 6 you went to the office first?  
 7 A I went to the office to use the phone and  
 8 then he came in behind me.  
 9 Q Which office?  
 10 A It was only one office.  
 11 Q Is that the office that Lincoln Barrett was  
 12 usually in?  
 13 A Yes.  
 14 Q Who did you call when you went into the  
 15 office?  
 16 A I was calling my brother.  
 17 Q Your brother was not at work that day?  
 18 A He didn't work there anymore.  
 19 Q What did you tell your brother?  
 20 A I didn't call him. I went to the office to  
 21 call my brother but I never made the phone call.  
 22 Q And then what happened next?

1 A That's when Taj came into the office and  
 2 called Express and fired me.  
 3 Q Do you know who he spoke to at Express?  
 4 A Whoever answered the telephone.  
 5 Q Was anyone else in the office besides you and  
 6 Taj?  
 7 A Kevis.  
 8 Q Was Lincoln Barrett present that day?  
 9 A He wasn't there -- he wasn't there at all  
 10 during this time.  
 11 Q When you say "he wasn't there at all" --  
 12 A He wasn't in the vicinity of Blockbuster at  
 13 all during this time.  
 14 Q Was he working for Blockbuster?  
 15 A Yes.  
 16 Q Did anyone from Express call you after this  
 17 incident?  
 18 A Did they call me? Um, let me see. I'm not  
 19 sure if they called me, but I know that I called them.  
 20 Q Who did you speak with?  
 21 A I asked for Cindy Brown.  
 22 Q Would that be Cinnie Brown?

1 A Uh-huh.  
 2 MS. KEILLER: (To the reporter) The spelling  
 3 is C-i-n-n-i-e.  
 4 Q What did you say to Ms. Brown when you called  
 5 her?  
 6 A I told her -- first I called to answer, you  
 7 know, what was going on, and I told her what took place  
 8 at Blockbuster, and she told me that she would get back  
 9 to me.  
 10 Q So after Taj calls Express and fires you,  
 11 what happens after that? Did you leave the facility?  
 12 A Yeah, I left.  
 13 Q When did you call Express to find out what  
 14 was going on?  
 15 A When I got home.  
 16 Q Did Ms. Brown ever call you back?  
 17 A Yes, I spoke to her.  
 18 Q And what did Ms. Brown say?  
 19 A I don't know what her exact words were, but I  
 20 think before I spoke with her, I spoke with Linc first.  
 21 Q Did you call Linc?  
 22 A Yes, I did.

1 Q What did you tell Linc?  
 2 A I told Linc that -- I asked him was I fired.  
 3 Q And what did he say?  
 4 A He said not to his knowledge and that he  
 5 would find out what's going on and he'll call me back.  
 6 Q And what did you say in response?  
 7 A I said, "Okay."  
 8 Q Was that the end of the conversation?  
 9 A Yes.  
 10 Q Did Linc ever call you back?  
 11 A No, I called him back.  
 12 Q And what did you say to Linc when you called  
 13 him back?  
 14 A I asked him did I still have a job, and  
 15 that's when he told me that he's going to stand by his  
 16 manager whether he believes he's right or wrong.  
 17 Q And what did you say to that?  
 18 A I mean, what could I say; I just got fired.  
 19 Q And that was the end of the conversation?  
 20 A That was the end of the conversation.  
 21 Q And did you talk to Cinnie Brown after that?  
 22 A Yes, I did.

<p style="text-align: right;">Page 37</p> <p>1 Q What did you say to Ms. Brown?</p> <p>2 A I told her, "Do you know that" -- I explained</p> <p>3 everything to her at that point, Do you know what was</p> <p>4 going on at Blockbuster, and I told her that I was</p> <p>5 terminated a couple of days after I told Linc what was</p> <p>6 going on with Taj, that he fired me.</p> <p>7 Q And what did Ms. Brown say?</p> <p>8 A She -- I had already spoken to her about it</p> <p>9 before, so she asked me to write everything down in the</p> <p>10 e-mail and e-mail it to her.</p> <p>11 Q And did you do that?</p> <p>12 A Yes, but she said she never received the</p> <p>13 e-mail.</p> <p>14 Q When did she say that?</p> <p>15 A Um, probably a couple of days later. I'm not</p> <p>16 sure but maybe it was -- it was the next day or a couple</p> <p>17 of days later, one or the other.</p> <p>18 Q Did you e-mail her again?</p> <p>19 A Yes, I kept sending it to her but it kept</p> <p>20 coming back to my computer.</p> <p>21 Q Did you save a copy of that e-mail?</p> <p>22 A Not from back then, no.</p>	<p style="text-align: right;">Page 39</p> <p>1 A No.</p> <p>2 Q Do you know what the position in Columbia</p> <p>3 was?</p> <p>4 A No.</p> <p>5 Q So, between your termination and your job at</p> <p>6 UnitedHealthcare in March of '05, did you have any other</p> <p>7 work?</p> <p>8 A No. No.</p> <p>9 Q How did you support yourself?</p> <p>10 A I lived at home with my mother.</p> <p>11 (Exhibit 3 marked for identification.)</p> <p>12 Q I'll give you a few moments to look over the</p> <p>13 document.</p> <p>14 A (Witness examines document.)</p> <p>15 Q Do you recognize this document?</p> <p>16 A Yes.</p> <p>17 Q What is it?</p> <p>18 A It's the complaint against Blockbuster.</p> <p>19 Q Do you know what the allegations in the</p> <p>20 complaint are?</p> <p>21 A Yes, I believe so.</p> <p>22 Q If you could turn to page five, please.</p>
<p style="text-align: right;">Page 38</p> <p>1 Q Did you ever send her via regular mail or</p> <p>2 hand her your complaints?</p> <p>3 A No, I let it go.</p> <p>4 Q Did you file an EEOC charge after your</p> <p>5 termination?</p> <p>6 A No.</p> <p>7 Q Did anyone suggest to you that you should</p> <p>8 contact the EEOC or the Maryland Commission on Human</p> <p>9 Rights?</p> <p>10 A I mean, family members that I told about the</p> <p>11 situation did, but I was young and I needed a job, so I</p> <p>12 didn't assign for that.</p> <p>13 Q After your conversation with Cinnie Brown</p> <p>14 about the e-mail, did you ever talk to her again?</p> <p>15 A I don't think so.</p> <p>16 Q Did Cinnie offer to find you another</p> <p>17 position?</p> <p>18 A Yes.</p> <p>19 Q And what did you say?</p> <p>20 A The job was too far out. I mean, I didn't</p> <p>21 live nowhere near Columbia.</p> <p>22 Q Did she offer you a position anywhere else?</p>	<p style="text-align: right;">Page 40</p> <p>1 Could you read the first sentence in paragraph 18,</p> <p>2 please?</p> <p>3 A "During the period December 2004 until on or</p> <p>4 about September 2005, Defendant, acting through</p> <p>5 supervisors Thomas A. Johnson, Kofi TuTu, Lincoln</p> <p>6 Barrett IV, and other management personnel, subjected a</p> <p>7 class of aggrieved female employees at its Gaithersburg,</p> <p>8 Maryland warehouse facility to a continuing course of</p> <p>9 unwelcome and offensive harassment because of their sex,</p> <p>10 female, and conduct protected by Section 704(a), in</p> <p>11 violation of Title VII."</p> <p>12 Q Is that an accurate reflection of your</p> <p>13 allegation?</p> <p>14 MR. PHILLIPS: Objection, foundation,</p> <p>15 misleading.</p> <p>16 Q Let me ask you --</p> <p>17 MR. PHILLIPS: Calls for a legal conclusion.</p> <p>18 Q Let me ask -- let me rephrase the question</p> <p>19 for you.</p> <p>20 Who do you think sexually harassed you?</p> <p>21 A I would say Taj.</p> <p>22 Q Anyone else?</p>

<p style="text-align: right;">Page 41</p> <p>1 A No.</p> <p>2 Q Did anyone touch you?</p> <p>3 A Taj.</p> <p>4 Q Where did he touch you?</p> <p>5 A My -- my behind.</p> <p>6 Q How often did he touch you on your behind?</p> <p>7 A Often. I would say almost every day.</p> <p>8 Q Would he touch you in front of other people?</p> <p>9 A Yes.</p> <p>10 Q Do you remember who witnessed him touching</p> <p>11 you?</p> <p>12 A I mean, no. Different people, though. But I</p> <p>13 can't remember names because I remember faces.</p> <p>14 Q When he touched your behind, what was your</p> <p>15 response?</p> <p>16 A I asked him to stop, but he would always say</p> <p>17 that it was an accident.</p> <p>18 Q Did you tell anyone about him touching your</p> <p>19 behind?</p> <p>20 A Yes.</p> <p>21 Q Who?</p> <p>22 A Linc.</p>	<p style="text-align: right;">Page 43</p> <p>1 Q And how did he say that?</p> <p>2 A I mean, he was pretty straightforward. I</p> <p>3 mean, "How much would it take?"</p> <p>4 Q How long did he make sexual comments?</p> <p>5 A Almost every day.</p> <p>6 Q And when did those comments begin?</p> <p>7 A A week after he was hired.</p> <p>8 Q What other sexual comments did he make?</p> <p>9 A Those was really the only comments. It was</p> <p>10 just the way that he looked at me every day and how he</p> <p>11 stared at my chest and stuff.</p> <p>12 Q When Taj made sexual comments, what did you</p> <p>13 say back to him?</p> <p>14 A I mean, I had, like, asked him to stop, but,</p> <p>15 you know, he wouldn't, so I went to Linc.</p> <p>16 Q Did you tell anyone other than Linc?</p> <p>17 A Yeah, I went home and told the people I live</p> <p>18 with what was going on.</p> <p>19 Q Did you tell Cinnie?</p> <p>20 A Yes.</p> <p>21 Q Did you tell Cinnie before you were</p> <p>22 terminated?</p>
<p style="text-align: right;">Page 42</p> <p>1 Q When did you tell Linc?</p> <p>2 A I told Linc when it first started.</p> <p>3 Q How long had you been working there before</p> <p>4 Taj touched your behind?</p> <p>5 A Well, when I started working there, Taj</p> <p>6 wasn't working there. He started maybe like</p> <p>7 two-and-a-half weeks later.</p> <p>8 Q So after Taj started working there, how long</p> <p>9 --</p> <p>10 A A week.</p> <p>11 Q Did he touch you anywhere else?</p> <p>12 A No.</p> <p>13 Q Who made sexual comments to you?</p> <p>14 A Taj.</p> <p>15 Q What kind of comments did he make?</p> <p>16 A He said stuff like, "Your mother must look</p> <p>17 good because of the way your butt looks."</p> <p>18 Q What other comments did he make?</p> <p>19 A Um, like he made, like, sexual gestures over</p> <p>20 the money for sex.</p> <p>21 Q What kind of sexual gestures?</p> <p>22 A He offer me money for sex.</p>	<p style="text-align: right;">Page 44</p> <p>1 A Yes.</p> <p>2 Q And he also made sexual requests?</p> <p>3 A Yes.</p> <p>4 Q What kind of sexual requests, other than</p> <p>5 those that you've already told us about?</p> <p>6 A That was it.</p> <p>7 Q And when he made these comments to you, where</p> <p>8 were you in the facility?</p> <p>9 A It was different places in the warehouse. It</p> <p>10 didn't just happen at one location in there. I mean, I</p> <p>11 could be at the machine where we put the movies in. I</p> <p>12 could be over there. I could be outside on my break. I</p> <p>13 mean, it was just different places inside the</p> <p>14 distribution center.</p> <p>15 Q Did he always make these comments around</p> <p>16 other people?</p> <p>17 A Not all the time, no.</p> <p>18 Q Did he make any other sexual -- did he ask</p> <p>19 you any questions about sex or sexuality?</p> <p>20 A I don't think so.</p> <p>21 Q Did anyone leer at you?</p> <p>22 A "Leer"?</p>

<p style="text-align: right;">Page 45</p> <p>1 Q Look at you in a sexual way?</p> <p>2 A Yes.</p> <p>3 Q Taj?</p> <p>4 A Yes.</p> <p>5 Q Anyone else?</p> <p>6 A No.</p> <p>7 Q And I realize this may be uncomfortable for</p> <p>8 you, but where did he look at you?</p> <p>9 A My breasts and my butt.</p> <p>10 Q How did you know he was looking at your butt?</p> <p>11 A Because you can always feel when somebody is</p> <p>12 looking at you. All you got to do is turn around.</p> <p>13 Q How often did he look at you that --</p> <p>14 A Every day.</p> <p>15 Q When did that begin?</p> <p>16 A A week. It was a week after -- it was</p> <p>17 exactly one week to the day that he was hired.</p> <p>18 MS. KEILLER: Do you need a break?</p> <p>19 THE WITNESS: Yes.</p> <p>20 (A brief recess was taken.)</p> <p>21 Q Are you ready?</p> <p>22 A Yes.</p>	<p style="text-align: right;">Page 47</p> <p>1 Q What?</p> <p>2 A Nothing, really.</p> <p>3 Q Did you tell anyone about him standing too</p> <p>4 close to you?</p> <p>5 A Yes.</p> <p>6 Q Who did you tell?</p> <p>7 A Linc and Cinnie.</p> <p>8 Q Anyone else?</p> <p>9 A (Nods negatively.)</p> <p>10 Q Did anyone ever make threats to you?</p> <p>11 A Um, like, what type of threats?</p> <p>12 Q Any type.</p> <p>13 A Um, I mean, my job was threatened at one</p> <p>14 point. That was about it.</p> <p>15 Q Who made that threat?</p> <p>16 A Taj.</p> <p>17 Q And what did he say?</p> <p>18 A He said that he would fire me.</p> <p>19 Q Do you remember when that was?</p> <p>20 A Maybe, maybe two weeks before I was fired.</p> <p>21 Q Why did he say that to you?</p> <p>22 MR. PHILLIPS: Objection. Foundation.</p>
<p style="text-align: right;">Page 46</p> <p>1 Q Back on the record. While you were working</p> <p>2 at Blockbuster, did anybody ever stand too close to you</p> <p>3 inappropriately?</p> <p>4 A Yes.</p> <p>5 Q Who was that?</p> <p>6 A Oh, Taj.</p> <p>7 Q Anyone else?</p> <p>8 A No.</p> <p>9 Q And how often did he stand too close to you?</p> <p>10 A A lot. On a day-to-day basis.</p> <p>11 Q And when he stood too close to you, what did</p> <p>12 you do?</p> <p>13 A I walked away.</p> <p>14 Q Did he follow you?</p> <p>15 A Not really.</p> <p>16 Q Did you say anything to him?</p> <p>17 A Yes.</p> <p>18 Q What did you say?</p> <p>19 A I told him that he was violating my space.</p> <p>20 Q And what did he say when you said that to</p> <p>21 him?</p> <p>22 A Nothing, really.</p>	<p style="text-align: right;">Page 48</p> <p>1 You can answer.</p> <p>2 A Oh, um, I can't remember the term of why he</p> <p>3 said it.</p> <p>4 Q Did you ever have an argument with Taj?</p> <p>5 A Before the day I got fired?</p> <p>6 Q Yes, before the day you got fired.</p> <p>7 A Not an argument, no.</p> <p>8 Q And do you remember the conversation you had</p> <p>9 with him before he threatened to fire you?</p> <p>10 A No.</p> <p>11 Q Did you tell anyone that he threatened to</p> <p>12 fire you?</p> <p>13 A Yes.</p> <p>14 Q Who did you tell?</p> <p>15 A I told Linc about it.</p> <p>16 Q Did you tell Cinnie?</p> <p>17 A No.</p> <p>18 Q Did you tell any of your family or friends?</p> <p>19 A I told my friend.</p> <p>20 Q Which friend was that?</p> <p>21 A Dwayne.</p> <p>22 Q Is that the same Dwayne that you live with</p>



<p style="text-align: right;">Page 49</p> <p>1 now?</p> <p>2 A Yes.</p> <p>3 Q Can you spell Dwayne?</p> <p>4 A D-w-a-y-n-e.</p> <p>5 Q Did anyone ever insult you?</p> <p>6 A Physically?</p> <p>7 Q "Insult."</p> <p>8 A "Insult," sorry.</p> <p>9 MR. PHILLIPS: Objection. Vague.</p> <p>10 You can answer.</p> <p>11 Q Did anyone at Blockbuster ever insult you</p> <p>12 while you were working there?</p> <p>13 MR. PHILLIPS: Same objection.</p> <p>14 You can answer.</p> <p>15 A I wouldn't say insult, no.</p> <p>16 Q Did anyone ever criticize your work while you</p> <p>17 were at Blockbuster?</p> <p>18 A Positively, yes.</p> <p>19 Q Who was that?</p> <p>20 A Linc.</p> <p>21 Q What did he say?</p> <p>22 A He always said that I was a good worker, I</p>	<p style="text-align: right;">Page 51</p> <p>1 terminated.</p> <p>2 Q Let's talk about the first time you talked to</p> <p>3 him. Where did you talk to him?</p> <p>4 A In the office.</p> <p>5 Q Was it during your shift?</p> <p>6 A Yes.</p> <p>7 Q Was anyone else present?</p> <p>8 A No, it was just me and Linc.</p> <p>9 Q Did you close the door?</p> <p>10 A Yes.</p> <p>11 Q What did you say to Linc?</p> <p>12 A I told Linc about the comments that were</p> <p>13 being made to me, about the constant brushing up against</p> <p>14 me and saying that it was an accident.</p> <p>15 Q Anything else?</p> <p>16 A No.</p> <p>17 Q What did Linc say?</p> <p>18 A Linc said that he would take care of it.</p> <p>19 Q When you talked to him, was it at the</p> <p>20 beginning of the shift or the end of the shift?</p> <p>21 A It was maybe the middle of the day.</p> <p>22 Q And after you talked to him, you went back to</p>
<p style="text-align: right;">Page 50</p> <p>1 was a fast learner, and I was doing a good job.</p> <p>2 Q Anyone else?</p> <p>3 A No, not really.</p> <p>4 Q Did anyone make negative criticisms of your</p> <p>5 work?</p> <p>6 A No.</p> <p>7 Q Were you ever sent home during one of your</p> <p>8 work shifts?</p> <p>9 A No.</p> <p>10 Q Did you ever lose any work hours while --</p> <p>11 A No.</p> <p>12 Q Are there any other sexual comments that were</p> <p>13 made that you haven't told us about that you can</p> <p>14 remember?</p> <p>15 A No.</p> <p>16 Q How often did you tell Linc about Taj's</p> <p>17 statements?</p> <p>18 A I told him twice.</p> <p>19 Q Do you remember when?</p> <p>20 A It was -- the first time I said something to</p> <p>21 Linc about it was December. The last time I say</p> <p>22 something to Linc about it was two days before I was</p>	<p style="text-align: right;">Page 52</p> <p>1 work?</p> <p>2 A Yes.</p> <p>3 Q Did the comments or touching cease?</p> <p>4 A No.</p> <p>5 Q Did he tell you how he was going to take care</p> <p>6 of it?</p> <p>7 A No.</p> <p>8 Q And you said the second time you talked to</p> <p>9 him was two days before you got fired?</p> <p>10 A Yes.</p> <p>11 Q What did you tell him then?</p> <p>12 A I told him the same thing, that the comments</p> <p>13 was still going on, the brushing up against me. Then</p> <p>14 when I go on break, how he kept coming -- purposely</p> <p>15 coming by me and stuff. I just reiterated what I told</p> <p>16 him before.</p> <p>17 Q And what did Linc say?</p> <p>18 A Linc said that he would talk to Taj.</p> <p>19 Q And when he said he would talk to Taj, do you</p> <p>20 know if he ever talked to him about it?</p> <p>21 A I'm pretty sure he did.</p> <p>22 Q Why are you pretty sure that he talked to</p>

<p style="text-align: right;">Page 53</p> <p>1 Taj?</p> <p>2 A Because I was terminated two days later by</p> <p>3 Taj.</p> <p>4 Q Did Taj say that Linc talked to him when he</p> <p>5 terminated you?</p> <p>6 A Everything Taj said was like rage, and it was</p> <p>7 in front of everybody, so he was making his intentions</p> <p>8 noticeable. That's what I'd say.</p> <p>9 Q Do you remember any of the words he used?</p> <p>10 A I mean, he said -- he did refer to the</p> <p>11 conversation that I had with Linc, but he didn't go into</p> <p>12 details about the conversation. And the only</p> <p>13 conversation I had with Linc was about the sexual</p> <p>14 harassment.</p> <p>15 Q How did he refer to the conversation?</p> <p>16 A He said I was going in the office snitching</p> <p>17 on him behind his back, telling Linc things that was</p> <p>18 going on.</p> <p>19 Q How often did you tell Cinnie Brown about --</p> <p>20 before you were terminated -- about the comments and</p> <p>21 actions by Taj?</p> <p>22 A Maybe a couple of times. Um, I can't say it</p>	<p style="text-align: right;">Page 55</p> <p>1 A No.</p> <p>2 Q The second time you talked to Cinnie, how did</p> <p>3 you speak to her?</p> <p>4 A Over the phone.</p> <p>5 Q Did you call her again?</p> <p>6 A Yes.</p> <p>7 Q Do you remember when that was, approximately?</p> <p>8 A No.</p> <p>9 Q What did you say the second time?</p> <p>10 A The same thing.</p> <p>11 Q Do you remember what her response was?</p> <p>12 A No.</p> <p>13 Q Do you remember how that conversation ended?</p> <p>14 A No.</p> <p>15 Q Did anyone else ever talk to you about your</p> <p>16 allegations other than your attorney?</p> <p>17 A No.</p> <p>18 Q Did you tell anyone else about your</p> <p>19 allegations other than Cinnie and Linc?</p> <p>20 A When it was going on?</p> <p>21 Q Yes.</p> <p>22 A Yes.</p>
<p style="text-align: right;">Page 54</p> <p>1 was once a week or twice a week, but I know I spoke with</p> <p>2 her a couple of times before my termination.</p> <p>3 Q Where did you speak with her?</p> <p>4 A Over the telephone.</p> <p>5 Q Did you call her?</p> <p>6 A Yes.</p> <p>7 Q The first time you called her, what did you</p> <p>8 say?</p> <p>9 A I told her that I was being sexually harassed</p> <p>10 at Blockbuster.</p> <p>11 Q Did you tell her that you spoke with Linc?</p> <p>12 A Yes, I did.</p> <p>13 Q What did she say?</p> <p>14 A She asked me what did I tell Linc or what did</p> <p>15 Linc do about it.</p> <p>16 Q And what did you say?</p> <p>17 A I wasn't sure.</p> <p>18 Q What did she say after that?</p> <p>19 A I don't -- I think that's when she told me to</p> <p>20 -- no, no, no, that's not when she told me that. I'm</p> <p>21 not sure what she said after that.</p> <p>22 Q Do you remember how the conversation ended?</p>	<p style="text-align: right;">Page 56</p> <p>1 Q Who?</p> <p>2 A I saw my friend about it, Dwayne, and I told</p> <p>3 my family members at home about it.</p> <p>4 Q Which family members?</p> <p>5 A My mother, my brothers.</p> <p>6 Q Including your brother who worked at</p> <p>7 Blockbuster?</p> <p>8 A Yes.</p> <p>9 Q Was your brother who worked at Blockbuster</p> <p>10 present any time --</p> <p>11 A No, he was fired by that time.</p> <p>12 Q Did you tell anyone other than Dwayne, your</p> <p>13 mom, your brothers, Linc and Cinnie?</p> <p>14 A Probably my sister. That's it.</p> <p>15 (Exhibit 4 marked for identification.)</p> <p>16 Q Do you recognize this document?</p> <p>17 A Um, no.</p> <p>18 Q I'll give you a chance to look through it.</p> <p>19 A (Witness examines document.)</p> <p>20 Q I will represent to you that these are</p> <p>21 interrogatory answers answered by your attorney in</p> <p>22 response to questions by Blockbuster.</p>

<p style="text-align: right;">Page 57</p> <p>1        Could you turn to page 15, please?</p> <p>2        In the middle of the page, starting with the</p> <p>3 paragraph, "During the course of her employment," it</p> <p>4 says that Thomas Johnson leered at you. Do you see</p> <p>5 that?</p> <p>6    A    Yes.</p> <p>7    Q    Stared at your buttocks?</p> <p>8    A    (Nods affirmatively.)</p> <p>9    Q    Are those the leering and buttocks-staring</p> <p>10 incidents that you told us about before?</p> <p>11    A    Yes.</p> <p>12    Q    Are there any others that you remember that</p> <p>13 you haven't told us about before?</p> <p>14    A    No.</p> <p>15    Q    (c) says he told her that her mother must</p> <p>16 look good based on the way you looked?</p> <p>17    A    Yes.</p> <p>18    Q    In addition to that comment and the other</p> <p>19 comments you've told us about already, are there any</p> <p>20 other comments that you can remember?</p> <p>21    A    No.</p> <p>22    Q    (d) says on four occasions he offered to pay</p>	<p style="text-align: right;">Page 59</p> <p>1    A    Yes.</p> <p>2    Q    How often did he scream at you?</p> <p>3    A    A lot, maybe a couple of times a day.</p> <p>4    Q    What did he scream?</p> <p>5    A    I mean, he did make it seem like I was</p> <p>6 incompetent, not doing the job correctly, like I was</p> <p>7 doing something wrong.</p> <p>8    Q    Did anyone else scream at you?</p> <p>9    A    No.</p> <p>10    Q    Did you see Taj screaming at other people?</p> <p>11    A    No.</p> <p>12    Q    Did you know Yasmina Assoumanou?</p> <p>13    A    Yes.</p> <p>14    Q    How do you know her?</p> <p>15    A    We worked together at Blockbuster.</p> <p>16    Q    How long did you work together?</p> <p>17    A    Not that long. Maybe a couple of weeks.</p> <p>18    Q    Were you friends?</p> <p>19    A    I wouldn't say friends; coworkers more like.</p> <p>20    Q    Have you spoken with Ms. Assoumanou since</p> <p>21 your employment with Blockbuster ended?</p> <p>22    A    No.</p>
<p style="text-align: right;">Page 58</p> <p>1 her money for sex.</p> <p>2    A    Yes.</p> <p>3    Q    Do you remember when he offered to pay you</p> <p>4 for sex?</p> <p>5    A    The exact time, no.</p> <p>6    Q    Approximately?</p> <p>7    A    It was in December.</p> <p>8    Q    Other than these occasions, do you remember</p> <p>9 any other occasions where he asked to pay you for sex?</p> <p>10    A    No.</p> <p>11    Q    (e) says he often moved his body</p> <p>12 inappropriately close to you, invading your personal</p> <p>13 space and causing you to feel highly uncomfortable?</p> <p>14    A    Yes.</p> <p>15    Q    Other than the incident you've already told</p> <p>16 us about, are there any other times when he moved</p> <p>17 inappropriately close to you and made you feel</p> <p>18 uncomfortable?</p> <p>19    A    I mean, he did it on a regular basis, so no.</p> <p>20    Q    I want you to move down to the next line.</p> <p>21 (g) after she complained about sexual harassment, he</p> <p>22 screamed at her frequently and threatened her job.</p>	<p style="text-align: right;">Page 60</p> <p>1    Q    Did you ever see anyone touch her?</p> <p>2    A    No, not touch her.</p> <p>3    Q    Did you ever hear anyone make sexual comments</p> <p>4 to her?</p> <p>5    A    Yes.</p> <p>6    Q    Who?</p> <p>7    A    Taj.</p> <p>8    Q    Anyone else?</p> <p>9    A    No.</p> <p>10    Q    What comments did he make to her?</p> <p>11    A    He'd say stuff about her butt and the size of</p> <p>12 her breasts.</p> <p>13    Q    What other comments did he make to her?</p> <p>14    A    That's it. That's what I could say.</p> <p>15    Q    Did you talk to her about the comments?</p> <p>16    A    No, not really.</p> <p>17    Q    Did you report the comments he made to her to</p> <p>18 anyone else?</p> <p>19    A    No.</p> <p>20    Q    Do you remember Lolita Gonzales?</p> <p>21    A    Yes.</p> <p>22    Q    How do you know Ms. Gonzales?</p>

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1 A We worked together at Blockbuster.  
2 Q Were you friends?  
3 A I wouldn't say friends, co-workers, but we  
4 did have conversations, yes.  
5 Q How often would you talk to her?  
6 A Every day I worked. Mostly every day.  
7 Q Did you ever see anyone touch her?  
8 A Physically touch, no.  
9 Q Did you ever hear anyone make sexual comments  
10 to her?  
11 A Yes.  
12 Q Who?  
13 A I heard Linc and Taj make comments to Lolita.  
14 Q What kind of comments did Linc make to her?  
15 A He was -- he always was calling her name a  
16 lot, and he'd -- it was like he gets real flirtatious  
17 with her.  
18 Q How so?  
19 A I mean, it's like a guy trying to hit on a  
20 girl. He was like really flirtatious with her.  
21 Q What kind of things did he do?  
22 A Like the way that he looked at her, the way

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1 that he talked to her.  
2 Q How did he look at her?  
3 A I don't want to get into this -- I can't  
4 describe the look, but it's like I want you look. To  
5 me, anyway.  
6 Q And how did he talk to her that made you  
7 think he was flirting with her?  
8 A Because he was always, like, close to her and  
9 he, like, dealt with her basically more than anyone else  
10 in there.  
11 Q What sexual comments did he make to her?  
12 A I don't know the sexual comments he made to  
13 her, but Taj, yes.  
14 Q But did Linc make any sexual comments to her  
15 that you can remember?  
16 A I mean ...  
17 MR. PHILLIPS: If you remember.  
18 Q If you remember, right. Take your time.  
19 A I can't say, because when I think of Linc,  
20 all I can remember is the way he used to call her name  
21 out all the time.  
22 Q Did Linc ever touch Lolita?

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1 A I've never seen him touch her.  
2 Q What kind of sexual comments did Taj make to  
3 Lolita?  
4 A Taj used to say stuff about her breasts.  
5 Q Anything else?  
6 A (Nods negatively.)  
7 Q Did you ever hear anyone make racial comments  
8 towards Lolita?  
9 A No.  
10 Q Do you remember Emetem Nkwetta?  
11 A I remember her but that's not what I called  
12 her.  
13 Q What did you call her?  
14 A Blythe.  
15 MS. KEILLER: (To the reporter) Emetem is  
16 spelled E-m-e-t-e-m, last name is N-k-w-e-t-t-a, and  
17 Blythe is B-l-y-t-h-e.  
18 Q How do you know Blythe?  
19 A We worked together at Blockbuster.  
20 Q Were you friends?  
21 A I would say that we were friends, yes.  
22 Q Did you ever hear anyone make sexual comments

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1 towards Blythe?  
2 A Yes.  
3 Q Who?  
4 A Taj.  
5 Q Anyone else?  
6 A No.  
7 Q What kind of comments did he make towards  
8 Emetem?  
9 A He used to make the same statements about her  
10 butt and her breasts.  
11 Q Anything else?  
12 A No.  
13 Q Did you talk with her about the comments?  
14 A Yes.  
15 Q What did you say?  
16 A I told her that I felt that it wasn't  
17 appropriate. She -- I'm not going to say she didn't  
18 know very much English, but their thoughts were -- her  
19 thoughts were different from mine. That's what I'll  
20 say.  
21 Q What were her thoughts?  
22 A I mean, I'm not going to say her thoughts,

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1 but I'm going to say her, her upbringing was different.  
2 She was a different nationality, so --  
3 Q What nationality was she?  
4 A She was African.  
5 Q What did she say about the comments?  
6 A She didn't like them, either.  
7 Q Did she ever tell you that she complained?  
8 A No. I didn't ask her.  
9 Q How many times did you talk with her about  
10 the comments?  
11 A Maybe a couple. Maybe, like, three.  
12 Q Did you report the comments to Blythe to  
13 anyone?  
14 A No.  
15 Q Did you ever see anyone touch Blythe?  
16 A No.  
17 Q Did you ever hear anyone make comments about  
18 her national origin to her?  
19 A No, I don't think so.  
20 Q Do you remember Delores Gonzales?  
21 A Yes.  
22 Q How do you know Ms. Gonzales?

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1 A That was Lolita's mother.  
2 Q Did you ever see anyone touch Delores  
3 Gonzales?  
4 A No. I'm trying to think because I don't know  
5 if she was working there then when I worked there, or  
6 did she work there later on. But no, I didn't see  
7 anything like that.  
8 Q Did you and Delores Gonzales work there at  
9 the same time?  
10 A That's what I was trying to think, because I  
11 know -- yeah, it was then. Yeah, we worked there at the  
12 same time.  
13 Q Did you ever hear anyone make sexual comments  
14 to her?  
15 A No.  
16 Q Did you ever hear anyone make racial comments  
17 to her?  
18 A No.  
19 Q Do you remember Elizabeth Ledesma?  
20 A Elizabeth? No.  
21 MS. KEILLER: (To the reporter)  
22 L-e-d-e-s-m-a.

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1 Q Do you remember Laquanta Brinson?  
2 A No, I don't think so.  
3 MS. KEILLER: (To the reporter) First name,  
4 L-a-q-u-a-n-t-a. Last name, B-r-i-n-s-o-n.  
5 Q Do you know Michelle Despertt?  
6 A I'm not really good with names. I remember  
7 faces. So the name doesn't ring a bell.  
8 Q Okay. Do you remember Milagros Ledesma?  
9 A No.  
10 Q Do you remember Grisel Nunez?  
11 A Grisel?  
12 Q Uh-huh.  
13 A No.  
14 Q Do you remember Lita Zubiata?  
15 A That name sounds familiar but I don't  
16 remember that person.  
17 MS. KEILLER: (To the reporter) L-i-t-a,  
18 Z-u-b-i-a-t-e.  
19 Q Do you know Gilda Arevalo, A-r-e-v-a-l-o?  
20 A No.  
21 Q Do you know Say Wing?  
22 A That's a girl?

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1 Q Yes.  
2 A No.  
3 Q And do you remember Victor Ruiz?  
4 A Uh-uh.  
5 Q And you said that Taj used to yell at you?  
6 A Yes.  
7 Q Did anyone else ever yell at you?  
8 A No.  
9 Q Did you ever see anyone yell at other  
10 employees?  
11 A Um, I know Linc used to yell, like, when a  
12 movie was missing or when something wasn't in order in  
13 the back of the warehouse. But to yell at a single  
14 person, no.  
15 Q So when Linc yelled, was he yelling at  
16 anyone?  
17 A No, he would yell -- he was yelling in  
18 general, because it would be time to go home and  
19 something would be missing or something and he yelled.  
20 Q Did anyone ever ask you to monitor the  
21 Hispanic employees?  
22 A No.

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1 Q Do you remember what the name of the crisis  
2 hotline was?  
3 A No, I just know it was a 202 number.  
4 Q How many times did you call the hotline?  
5 A I was calling, like, every night.  
6 Q What did you tell them when you called the  
7 hotline?  
8 A I told them about my problems and that I  
9 think I needed to see a psychiatrist.  
10 Q Did they give you any advice?  
11 A They gave me a referral to see a psychiatrist  
12 in D.C.  
13 Q And you didn't follow through with the  
14 referral?  
15 A No, I didn't have the money.  
16 Q How much did it cost?  
17 A Um, I think they said \$75 a session.  
18 Q Did you look into talking with social  
19 workers?  
20 A No.  
21 Q Did you look into any clinics?  
22 A No.

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1 Q Were there any other ways you tried to treat  
2 your emotional distress?  
3 A Talking about it. That was it.  
4 Q Are you seeing any psychiatrists or  
5 psychologists now?  
6 A No.  
7 Q Seeing any social workers now?  
8 A No. I talked to my sister. She's a  
9 psychiatrist, so I talked to her. That's about it.  
10 Q Have you suffered any other emotional pain?  
11 A No.  
12 Q Have you suffered any inconvenience since  
13 your assignment at Blockbuster?  
14 A Yes.  
15 Q Can you tell me about those inconveniences,  
16 please, other than what you've already told me?  
17 A Oh, no, no, not other than what I've already  
18 told you.  
19 Q Did you ever receive a handbook from  
20 Blockbuster?  
21 A No.  
22 Q Did you receive any documentation from

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1 Blockbuster?  
2 A Nope.  
3 Q During your time at Blockbuster, who paid  
4 you?  
5 A Express.  
6 Q Did you know about Blockbuster's ethics  
7 hotline?  
8 A That number they put up in the break room?  
9 Q Yes.  
10 A That happened after I got fired.  
11 Q How did you know about it?  
12 A Um, who was it? Somebody that still work  
13 there told me about it. I'm thinking it was Kevis,  
14 because I continued to talk to him for a while after I  
15 stopped working there.  
16 Q Do you still talk to Kevis?  
17 A Now, no.  
18 Q Have you talked to anyone that you worked  
19 with at Blockbuster --  
20 A -- since Blockbuster?  
21 Q Yes.  
22 A No. Actually, I take that back. I have.

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1 Um, I talked to Blythe before she moved to Texas. And  
2 actually I had a conversation with her since she's lived  
3 in Texas.  
4 Q When you talked to Blythe, did you talk about  
5 your assignment at Blockbuster?  
6 A No. She told me she didn't work there  
7 anymore, so we didn't talk about Blockbuster.  
8 Q Other than Blythe and Kevis, are there any  
9 other people you talked to from your assignment at  
10 Blockbuster since you left?  
11 A There was a guy that worked there. I had a  
12 couple of conversations with him, but I can't remember  
13 his name. I just remember he was light-skinned.  
14 Q Anyone else?  
15 A No.  
16 MS. KEILLER: I'll pass the witness.  
17 EXAMINATION  
18 BY MR. PHILLIPS:  
19 Q Ms. Fields, I just have two questions for  
20 you. The first question is, at any time did anyone from  
21 any company ever interview you to ask you if you had  
22 seen other women being sexually harassed at Blockbuster?

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1 A What you mean "from any company"?

2 Q Did anyone from Express Personnel, anybody

3 from Blockbuster, ever ask you if you had seen other

4 women being sexually harassed?

5 A No.

6 Q And earlier in your testimony, there was a

7 reference to Yasmina Assoumanou? Remember that?

8 A Yes.

9 Q At the time, you knew her as Jasmine;

10 correct?

11 A Yes.

12 MR. PHILLIPS: Pass the witness.

13 MS. KEILLER: No further questions.

14 MR. PHILLIPS: We'll read and sign.

15 (Signature having not been waived, the

16 deposition of NI'EMA FIELDS concluded at 12:52 p.m.)

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1 ACKNOWLEDGEMENT OF DEPONENT

2 I, NI'EMA FIELDS, do hereby acknowledge that

3 I have read and examined the foregoing testimony, and

4 the same is a true, correct and complete transcription

5 of the testimony given by me, and any corrections appear

6 on the attached Errata sheet signed by me.

7

8 \_\_\_\_\_

9 (DATE) (SIGNATURE)

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1 CERTIFICATE OF COURT REPORTER/NOTARY PUBLIC

2 I, Susan Ingram, Certified Court Reporter and

3 Registered Professional Reporter, the officer before

4 whom the foregoing proceedings were taken, do hereby

5 certify that the foregoing transcript is a true and

6 correct record of the proceedings; that said proceedings

7 were taken by me stenographically and thereafter reduced

8 to typewriting under my supervision, and that I am

9 neither counsel for, related to, nor employed by any of

10 the parties to this case and have no interest, financial

11 or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I hereunto set my hand

13 and affix my notarial seal this 5th day of November,

14 2008.

15

16 My Commission expires:

17 March 31, 2013

18

19 \_\_\_\_\_

20 NOTARY PUBLIC IN AND FOR

21 THE DISTRICT OF COLUMBIA

22

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1 E R R A T A S H E E T

2 IN RE: EEOC vs. BLOCKBUSTER, INC.

3 RETURN BY:

4 PAGE LINE CORRECTION AND REASON

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22 (DATE) (SIGNATURE)