

# ***EXHIBIT C***

LINDA SHIMA-TSUNO

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BOURNE CO.,	)	ORIGINAL
	)	
Plaintiff,	)	
	)	
vs.	) No. 07 CIV. 8580 (DAB)	
	)	
TWENTIETH CENTURY FOX FILM	)	
CORPORATION, FOX BROADCASTING	)	
COMPANY, TWENTIETH CENTURY FOX	)	
TELEVISION, INC., TWENTIETH	)	
CENTURY FOX HOME ENTERTAINMENT,	)	
INC., FUZZY DOOR PRODUCTIONS,	)	
INC., THE CARTOON NETWORK, INC.,	)	
SETH MAC FARLANE, WALTER MURPHY,	)	
	)	
Defendants.	)	
	)	

30(B)(6) DEPOSITION OF FOX EMPLOYEE  
LINDA SHIMA-TSUNO  
TAKEN ON  
WEDNESDAY, MARCH 12, 2008

Reported by:  
Daryl Baucum, RPR, CRR, CBC, CSR No. 10356

LINDA SHIMA-TSUNO

1 standards and practices?

2 A. In 2000.

3 Q. What position did you have at the time that you  
4 left?

5 A. Director of Standards and Practices.

6 Q. And how long were you Director of Standards and  
7 Practices?

8 A. I don't remember. Maybe two years.

9 Q. In your capacity in working in standards and  
10 practices, were you involved at all in the "Family Guy"  
11 television show?

12 A. Yes.

13 Q. What did you do with respect to the "Family  
14 Guy" show?

15 A. I was assigned to "Family Guy" for standards  
16 and practices purposes for clearance.

17 Q. And did you do that from the beginning of when  
18 the "Family Guy" show was first on the air?

19 A. Yes.

20 Q. And were you assigned to the "Family Guy" show  
21 up until the time you left Fox?

22 A. Yes, I was.

23 Q. Can you please explain to me what exactly is  
24 standards and practices.

25 A. We review material for acceptability for

LINDA SHIMA-TSUNO

1 broadcast.

2 Q. And when you were working on the "Family Guy"  
3 show during that period of time, whom did you report to?

4 A. Roland MacFarland.

5 Q. And what was his position?

6 A. Vice President of Standards and Practices.

7 Q. How would you characterize your working  
8 relationship with the folks at "Family Guy"?

9 A. I thought it was very good.

10 Q. Do you remember working on an episode called  
11 "When You Wish Upon a Weinstein?"

12 A. Yes, I do.

13 Q. And how is your memory of the work that you did  
14 on the Weinstein episode?

15 A. What do you mean?

16 Q. Do you remember it well?

17 A. I remember it. I may not remember details. I  
18 have put a lot of time into that episode because it was  
19 problematic.

20 Q. And why was that episode particularly  
21 problematic?

22 A. It had the potential to be offensive to  
23 Jewish -- to the Jewish community.

24 Q. What it was about the episode that had that  
25 potential?

LINDA SHIMA-TSUNO

1           A.    Well, Peter wanted to -- Peter wanted to be  
2 good with money and he wasn't a very bright guy. And in  
3 speaking with his friends, he discovered that all his  
4 friends had people helping them manage their money, and  
5 it just happened that his friends' people had Jewish  
6 last names.

7                        So Peter deducted that Jewish people were good  
8 with money, could handle money well, and so he wanted to  
9 become Jewish.

10           Q.    Who at "Family Guy" in the production did you  
11 deal directly with for purposes of clearance?

12           A.    Mostly David Zuckerman and Seth MacFarlane.

13           Q.    And at what stage of the production of the  
14 episode did you first get involved?

15           A.    Actually, I think someone brought it up during  
16 the concept level. That's my memory.

17           Q.    Were you at the first table read of the  
18 episode?

19           A.    I imagine I was -- yes, I was.

20           Q.    And what was your first reaction after the  
21 table read?

22           A.    That there were many problems with the episode,  
23 that we would have to work through a lot of things in  
24 the episode.

25           Q.    And did you communicate this reaction to the

LINDA SHIMA-TSUNO

1 "Family Guy" staff?

2 A. Yes.

3 Q. And in what ways did you have telephone  
4 conversations with them?

5 A. Yes, many.

6 Q. And did you also send letters?

7 A. Yes.

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**REDACTED**

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Q. Can you tell me who Ken Dennis is?

A. Ken Dennis, he was a producer for "Family Guy."

**REDACTED**



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**REDACTED**

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Q. Did Rabbi Levi ever provide a written letter  
of -- any written form of his opinion about the episode?

LINDA SHIMA-TSUNO

1 A. You know, I don't recall.

2 Q. And what was his opinion?

3 A. He was not offended by the episode, but I do  
4 believe that he thought the song might offend some  
5 people. I think everyone thought that.

6 Q. And so did he -- he didn't give an overall  
7 approval of the entire episode?

8 A. No, he gave some notes, you know, on sections  
9 that he thought should be revised.

10 Q. And particularly, he mentioned the song as one  
11 thing that he had a --

12 A. That was one -- I believe everyone mentioned  
13 the song. So I am assuming he did, too.

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**REDACTED**

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**REDACTED**

Q. And do you know who selected Rabbi Geller?

A. I did through a recommendation from someone else.

Q. And was she provided a copy of the script?

A. Yes.

Q. And I take it Seth and David knew you were going to talk to her, as well?

A. Oh, yes.

Q. Did Rabbi Geller give any written opinion to you?

A. You know, I don't recall if any of them gave a written opinion.

Q. What was Rabbi Geller's opinion of the program?

A. She thought it was very offensive.

Q. Do you recall what her specific problems were with the episode?

A. She didn't like it at all.

Q. And I take it that would include the song?

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A. That included the song.

**REDACTED**

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## REDACTED

6 Q. Did anyone at "Family Guy" ever tell you that  
7 the "I Need A Jew" song was specifically meant to make  
8 fun of the alleged antisemitism of Walt Disney?

9 A. I don't recall that.

10 Q. At some point -- I'm sorry -- what was the --  
11 was the episode cleared during season two for broadcast?

12 A. No.

13 Q. Why not?

14 A. Senior management felt that it was just too  
15 potentially offensive.

16 Q. At some point did you learn that Fox had  
17 decided to broadcast the Weinstein episode?

18 A. After I had left, yes.

19 Q. And were you surprised to find that out?

20 A. Actually, they did this once before. So, no.

21 MR. FAKLER: Those are all the questions I  
22 have.

23 MR. ZAVIN: Hold on just one moment.

24 (Off the record.)

25 MR. ZAVIN: Just a couple of very brief

# EXHIBIT PL 11

***EXHIBIT FILED  
WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***



# EXHIBIT PL 12

***EXHIBIT FILED  
WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***

# EXHIBIT PL 13

***EXHIBIT FILED  
WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***

# EXHIBIT PL 14

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WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***

# EXHIBIT PL 15

***EXHIBIT FILED  
WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***



# EXHIBIT PL 17

***EXHIBIT FILED  
WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***

# EXHIBIT PL 18

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WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***

# EXHIBIT PL 19

***EXHIBIT FILED  
WITH THE COURT  
UNDER SEAL  
PURSUANT TO  
PROTECTIVE  
ORDER***