

**EXHIBIT B**

**TO CROWTHER DECLARATION**

**IN SUPPORT OF ONE 3 TWO, INC.'S**

**MOTION IN LIMINE NO. 2**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHEPARD FAIREY and OBEY GIANT  
ART, INC.,

Plaintiffs,

vs.

1:09-CV-1123 (AKH)

THE ASSOCIATED PRESS,

Defendant/Counterclaim Plaintiff,

vs.

SHEPARD FAIREY, OBEY GIANT  
ART, INC., OBEY GIANT LLC and  
STUDIO NUMBER ONE, INC.,

Counterclaim Defendants.  
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VIDEOTAPED DEPOSITION OF  
KATHLEEN KEDROWSKI  
Wednesday, December 15, 2010  
9:30 a.m.

Reported by:  
Joan Urzia



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**EXHIBIT** B

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K. Kedrowski

that you have seen was the Soup Nazi  
\$30,000 license; is that correct?

MS. RAY: Objection. Form.  
Misstates her testimony.

A. I don't know that I said that  
yesterday. I don't -- I'm not specifically  
recalling that.

Q. Have you seen a license that  
generated more than \$30,000 in revenue?

MS. RAY: Objection to form.  
Lack of foundation.

A. Are you limiting your question to  
documents in this record? I just want  
to -- I mean, I have seen lots of licenses  
in my career. So I just want to be clear  
with my answer here on the record. What  
you limiting -- what is the limitation to  
your question?

Q. A fair point.  
In this litigation --

A. Okay.

Q. -- have you seen any license from  
the AP --

A. Okay.



1 K. Kedrowski

2 Q. -- for a photo where the AP  
3 generated more than \$30,000 as a result of  
4 that?

5 MS. RAY: Objection to form.

6 Asked and answered.

7 A. On a single license is what  
8 you're saying, just to be clear?

9 Q. Yes.

10 A. I don't think I have. I think  
11 that license is the largest one in total  
12 that is in the record as a single license.

13 Q. If you could turn to your second  
14 report, which is Exhibit 2 --

15 A. Can I put away Mr. Zoltowski?

16 Q. Yes, sorry.

17 A. Sorry, these things are really  
18 big, so.

19 Q. Okay.

20 Exhibit 2, if you'll turn to page  
21 7, if you'll look at paragraph 14-A at the  
22 bottom of the page, it states that you were  
23 retained to render your independent damages  
24 related opinions -- sorry, I paraphrased  
25 that -- you were asked to render an opinion



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C E R T I F I C A T E

STATE OF NEW YORK )

: SS.

COUNTY OF NEW YORK )

I, Joan Urzia, a Notary Public within and for the State of New York, do hereby certify:

That KATHLEEN KEDROWSKI, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 16th day of December, 2010.

\_\_\_\_\_  
Joan Urzia



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