

# EXHIBIT M

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C O N F I D E N T I A L

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
11-CV-03605(JSR)(HBP)

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IRVING H. PICARD, Trustee for  
the Liquidation of Bernard L.  
Madoff Investment Securities LLC,

Videotaped  
Deposition of:

Plaintiff,

CHRISTOPHER STAMOS

vs.

SAUL B. KATZ, et al.,  
Defendants.

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Transcript of testimony as taken by and before  
LESLIE ROCKWOOD, Certified Court Reporter, RPR and Notary  
Public of the State of California, at the offices of  
Shearman & Sterling, Four Embarcadero, Suite 3800,  
San Francisco, California, on Wednesday, January 4, 2012,  
commencing at 9:31 a.m.

1 didn't -- it wasn't my responsibility to know much about  
2 their business.

3 Q. Does the name Chuck Klein ring a bell?

4 A. It does.

5 Q. Do you know if Chuck Klein was associated  
6 with Sterling American Properties?

7 A. I don't. It just rings a bell. I can't  
8 remember if he was a client or friend of my brother's. I  
9 don't think I met Chuck Klein, and if I did, I can't  
10 remember him.

11 Q. Is there anything else you can remember about  
12 Chuck Klein right now?

13 A. No.

14 Q. In addition to helping create -- strike that.

15 As part of creating a logo, why were you  
16 combining the names Sterling and Stamos?

17 A. So our branding approach was to try to  
18 co-brand with Sterling. We're a new company, and when  
19 you co-brand, you try to get the halo effect from your  
20 partner to apply to yourself.

21 So the idea was Sterling had been doing work  
22 in New York and building a reputation for Sterling  
23 Equities, Sterling American Properties. Sterling Group  
24 had been building a good reputation in New York, and we  
25 wanted some of that to apply to us, but we wanted to be

1 separate.

2 So the idea was to take both names to show  
3 that we're partners, but also be separate so that people  
4 would understand that we are separate from Sterling  
5 Equities, Sterling American Properties.

6 Q. And just so the record is clear, what do you  
7 mean by "co-brand"?

8 A. So co-branding means to associate your name  
9 with a pre-existing company so that you can get some of  
10 the positive associations that company has applied to  
11 your company as well.

12 Q. And when you use the phrase "halo effect,"  
13 what are you referring to?

14 A. If they are a company with a good reputation,  
15 then that halo means their good reputation covers your  
16 head as well.

17 Q. And when were you trying to combine or  
18 co-brand the two names of Sterling and Stamos?

19 A. Again, it was in that early period when we  
20 were still SP Capital, but we were going to form the new  
21 name, new LLC. And I don't remember the exact date, but  
22 it was the first few -- maybe the first six months of my  
23 being in the company.

24 Q. And so is it fair to say that part of the  
25 time that you were creating this logo, you were working

1 MR. DITCHFIELD: Objection.

2 THE WITNESS: Again, I don't like the word  
3 "have to." So I would say no, he didn't have to do  
4 anything, but...

5 Q. BY MS. KOSACK: Did Peter ever consult with  
6 Saul Katz in connection with the co-branding projects, to  
7 the best of your knowledge?

8 MS. BIEBER: Objection.

9 You can answer.

10 MR. DITCHFIELD: Objection.

11 THE WITNESS: To the best of my knowledge, he  
12 didn't because I don't think Saul would be interested in  
13 the logo or --

14 Q. BY MS. KOSACK: Did Peter ever consult, to  
15 the best of your knowledge, with David Katz in connection  
16 with the co-branding projects?

17 A. Again, to the best of my knowledge, no, but  
18 that was eight years ago and...

19 Q. To the best of your knowledge, did Peter ever  
20 consult with Fred Wilpon in connection with the  
21 co-branding projects?

22 A. That I'm pretty sure he didn't. Again, if  
23 Saul was removed, Fred was even more removed. So I would  
24 be surprised if Fred wanted to look at our logo.

25 Q. And going back to the halo effect, what, if

1 any, halo effect did you hope to obtain from Sterling  
2 Equities?

3 A. My understanding was the 30-some years of  
4 doing business in New York, Saul and Fred had a  
5 reputation for taking care of their partners, being very  
6 ethical, being very generous, their philanthropic work,  
7 they've earned a reputation for being very quiet and  
8 generous in their giving.

9 And baseball, in our business, baseball  
10 carries a lot of weight. So owning the New York Mets,  
11 having access to the owner's box is a great thing for  
12 clients, and hedge fund managers like baseball in  
13 general.

14 Q. And when you say in your business baseball  
15 carries a lot of weight, what else did you mean in  
16 addition to what you just said, if anything?

17 A. I don't think I meant anything more than if  
18 you could call up someone and say, "Do you guys want to  
19 come to the owner's box," they would be pretty happy  
20 about it.

21 Q. Where did you obtain your understanding of  
22 the information you just described as part of the halo  
23 effect of Sterling Equities?

24 MR. DITCHFIELD: Objection to the form.

25 MS. BIEBER: Objection.

1                   You can answer.

2                   THE WITNESS: From my brother Peter telling  
3 me that Saul and Fred have a great reputation in this  
4 city and we can benefit from that reputation.

5                   Q. BY MS. KOSACK: Did Peter tell you anything  
6 else about Saul and Fred at this time?

7                   MR. DITCHFIELD: Objection to the form.

8                   THE WITNESS: Not that I can recall.

9                   Q. BY MS. KOSACK: Did you ever have any  
10 discussions with Peter about Saul Katz and Fred Wilpon's  
11 investments at this time?

12                   A. Their personal investments or their  
13 investments with us?

14                   Q. Let's start with their personal investments.

15                   A. Their personal investments, no, but part of  
16 my job was to know how much money Saul and Fred are  
17 invested with Sterling Stamos.

18                   Q. During these initial stages, did you have  
19 discussions with Peter Stamos about Saul Katz and Fred  
20 Wilpon's investments with Sterling Stamos?

21                   A. Yes.

22                   Q. What were those discussions about?

23                   A. The discussions were about how much money  
24 they had with us in the funds, meaning total, like how  
25 many millions are invested in which specific fund.