

EXHIBIT A

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK
No. 1:10-cv-00569-RJA

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PAUL D. CEGLIA,

Plaintiff,

vs.

MARK ELLIOT ZUCKERBERG,
Individually, and
FACEBOOK, INC.,

Defendants.

-----x

July 11, 2012
10:03 a.m.

Videotaped deposition of LARRY F.
STEWART, held at the offices of Gibson,
Dunn & Crutcher LLP, 200 Park Avenue,
New York, New York, pursuant to notice,
before Cary N. Bigelow, Court Reporter,
a Notary Public of the State of New York.

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A P P E A R A N C E S:

BOLAND LEGAL, LLC
Attorneys for Plaintiff
1475 Warren Road
Unit 770724
Lakewood, Ohio 44107

BY: DEAN BOLAND, ESQ.

GIBSON, DUNN & CRUTCHER LLP
Attorneys for Defendants
200 Park Avenue
New York, New York 10166-0193

BY: ORIN SNYDER, ESQ.
ALEXANDER H. SOUTHWELL, ESQ.
MATTHEW BENJAMIN, ESQ.
AMANDA AYCOCK, ESQ.
SRIPRIYA NARASIMHAN, ESQ.

ALSO PRESENT:

PETER TYTELL
GERALD LAPORTE
NADER KHORASSANI, Summer Associate,
Gibson, Dunn & Crutcher, LLP
(a.m. session)
ANNA CHASE, Summer Associate,
Gibson, Dunn & Crutcher, LLP
(p.m. session)
DANIEL McCLUTCHY, Videographer

1 L. Stewart

2 another?

3 A. That's correct, that's my testimony.

4 Q. What about Eric Speckin, have you ever
5 spoken with him about this case?

6 A. Yes.

7 Q. In fact, he examined the original
8 so-called Work For Hire document with you in July
9 of 2011; correct?

10 A. Yes.

11 Q. And do you know why he didn't provide a
12 report?

13 A. No. That's between him and Mr. Boland
14 and Mr. Argentieri.

15 Q. You never spoke to Mr. Speckin about
16 that?

17 A. Why he did not issue a report, no.

18 Q. You both took samples from the
19 documents; correct?

20 A. Yes.

21 Q. Did he take samples of paper?

22 A. I don't recall if he took samples of
23 paper.

24 Q. Did he take samples of ink?

25 A. I believe he did, yes.

1 L. Stewart

2 Q. Did he take samples of attorney?

3 A. I don't recall.

4 Q. Are you aware of whether he ran any
5 tests on these samples?

6 A. Yes, he did tests on the samples.

7 Q. Did he test the paper?

8 A. I don't know.

9 Q. Did he test the toner?

10 A. I don't know.

11 Q. Did he test the ink?

12 A. I believe so.

13 Q. What kind of test did he subject the
14 ink to?

15 A. I don't know all of the tests that he
16 conducted. I know he tried to identify the ink.

17 Q. Do you know what his results of his
18 examination were?

19 A. It would be best to come from him, but
20 I believe that his results from our phone calls
21 were that it was deteriorated to the point that
22 he could not identify it.

23 Q. And do you know why he did not issue a
24 written report to that effect?

25 A. No, I do not.

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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, CARY N. BIGELOW, Court Reporter,
a Notary Public within and for the State of
New York, do hereby certify:

That LARRY F. STEWART, the witness
whose testimony is hereinbefore set forth,
was duly sworn by me and that such
testimony given by the witness was taken
down stenographically by me and then
transcribed.

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 12th day of July, 2012.

CARY N. BIGELOW