

EXHIBIT 14

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

EDWARD CARRINGTON, et al.,)
)
 Plaintiffs,)
)

vs.)

DUKE UNIVERSITY, et al.,)
)
 Defendants.)

Civil Action
No. 1:08-CV-00119

_____ /

VIDEOTAPED DEPOSITION OF KYLE W. DOWD
(taken by Defendant)
 Thursday, December 29, 2011
 New York, New York

1 A. Correct.

2 Q. To the best of your knowledge?

3 A. Correct.

4 Q. Did everyone contribute the same amount
5 or were there varying amounts?

6 A. I believe everyone contributed the same
7 amount.

8 Q. Did the money go all for the hiring of
9 the dancers or was there also a portion that went for
10 the party itself?

11 A. That I'm not sure about.

12 Q. Was there alcohol at the party?

13 A. Yes.

14 Q. How did it get there?

15 A. I do not know.

16 Q. You didn't bring any alcohol?

17 A. I don't think so.

18 Q. But you remember drinking alcohol while
19 there?

20 A. Correct.

21 Q. What type of alcohol did you drink?

22 A. I believe I just drank beer.

23 Q. Was there other alcohol available?

24 A. I'm not sure.

25 Q. If you could, starting with when you got

1 back from your nap, got back to 610 from your nap, walk
2 me through the evening, as you remember it.

3 A. So I got back. I believe the dancers
4 arrived not too long after that.

5 Do I have to give just a narrative now,
6 the entire night, or can we just ask more specific
7 questions?

8 Q. We can go step by step.

9 A. Yes, can we go step by step, please?

10 MS. SPARKS: Can I just make a standing
11 objection in the beginning so I don't interrupt
12 you all the time.

13 To the extent that any of your answers
14 are based on conversations that you learned
15 from Ekstrand & Ekstrand, I would instruct you
16 not to answer those questions. Now, if you
17 have your own personal knowledge, separate from
18 our conversations with you, then our
19 instruction doesn't apply to that.

20 MR. FALCONE: That's a standing
21 instruction not to answer?

22 MS. SPARKS: No, a standing instruction
23 not to answer if there is anything that you ask
24 among this -- I mean -- or I can do it each
25 question.

1 I would say yes.

2 Can I just have a second to read this?

3 Q. Sure?

4 A. Okay.

5 Q. This is addressed to you?

6 A. Correct.

7 Q. And these are fees that you incurred?

8 A. Correct.

9 Q. And these are fees that you paid?

10 A. Correct.

11 Q. Have you turned over all statements from
12 Poyner & Spruill related to your representation by
13 them?

14 A. I believe so, yes.

15 Q. Did you at some point learn that your
16 DukeCard information was turned over to the Durham
17 police?

18 MS. MOSS: Objection.

19 MS. SPARKS: Objection. To the extent
20 that he learned it through counsel during our
21 representation of him, I would instruct him not
22 to answer it on attorney-client privilege.

23 Q. What I am asking for is a fact, whether
24 or not you know, yes or no, whether your information
25 was turned over to the Duke police.