

EXHIBIT 15

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

EDWARD CARRINGTON, et al.,)
) No. 1:08-CV-001 19
 Plaintiffs,)
)
v.)
)
DUKE UNIVERSITY, et al.,)
)
 Defendants.)
_____)

VIDEOTAPED DEPOSITION OF
STEPHEN DEARNLEY SCHOEFFEL
Thursday, February 23, 2012
Cary, North Carolina

Court Reporter: Nancy J. Martin, California and
Delaware CSR, RPR

1 Q. How long did you stay at the house on
2 Urban Street?

3 A. I don't remember exactly how long I stayed.
4 I stayed long enough for some people to come back from
5 610 and stayed a little bit longer than that and then
6 went back to my dorm.

7 Q. Who came back from 610?

8 A. The only guy I remember specifically coming
9 back is Rob Schroeder. He's the only guy I remember
10 specifically.

11 Q. What do you remember about him coming back?

12 A. I remember the general sentiment of the crowd
13 that came back was "That was really lame." There was
14 talk about the girl just trying to take the money and
15 the feeling that that was a letdown. That the guys
16 were like saying that that was just kind of a -- you
17 know, a waste of time.

18 Q. How did they express to you that it was a
19 letdown?

20 A. Just, you know, through -- so Bo and I
21 continued to play the video game, and people were
22 having these side conversations or, you know, in
23 response to kind of a general question of "What's up?
24 What's going on?"

25 Q. To your knowledge, before you left the party,

1 were there any non-lacrosse players in attendance?

2 MS. SMITH: Steve, I'm just going to object
3 to the extent that that information you only know from
4 your representation with Ekstrand & Ekstrand, and I
5 instruct you not to answer.

6 THE WITNESS: Right. This is something that
7 I learned from counsel later.

8 BY MR. FALCONE:

9 Q. When you say, "counsel," who are you
10 referring to?

11 A. From Ekstrand.

12 Q. When you left the party then, you didn't see
13 any non-lacrosse players at the party?

14 A. No.

15 Q. Did you consider the party a team sanctioned
16 event?

17 A. I didn't consider it in any sort of official
18 gathering or event in -- that kind of goes along with
19 a party. I wouldn't call it that. I wouldn't call it
20 an event because it was far more informal in my mind.

21 Q. Were there any team members -- when you left
22 the party, were there any team members that weren't at
23 the party?

24 A. This is something that I've learned since
25 from just reading about who was there and who wasn't.

1 any charge and decisions were made in the case, all 47
2 members of the men's lacrosse team had immutable
3 digital alibis that were corroborated by the witness
4 accounts of every individual present." Did you have a
5 digital -- I'm sorry. Did you have an immutable
6 digital alibi?

7 MR. EKSTRAND: Objection.

8 Answer the question if you could possibly
9 answer it without revealing communications with
10 counsel.

11 THE WITNESS: Okay.

12 MR. FALCONE: Obviously, clear but for the
13 purpose of the record, the counsel that we're
14 referring to is Mr. Ekstrand?

15 MR. EKSTRAND: Criminal counsel and anybody,
16 obviously, within the scope of the privilege.

17 THE WITNESS: I answered that I can't respond
18 due to that counsel.

19 BY MR. FALCONE:

20 Q. When did you first learn that your DukeCard
21 information had been subpoenaed?

22 MR. EKSTRAND: Objection.

23 To the extent that it calls for attorney
24 cases with counsel, I'll instruct you not to answer.

25 THE WITNESS: And I can't because of counsel.

1 A. So you're asking if the meeting itself
2 between Tallman Trask and --

3 Q. No. I'm sorry. I'm asking about your
4 knowledge of the meeting, when you learned about it.
5 I'm trying to pinpoint that time --

6 MR. MULLINS: The general time when you found
7 out about this information, not who told you or
8 anything like that. Just general.

9 THE WITNESS: Yeah. I didn't know -- it was
10 after the fact.

11 BY MR. FALCONE:

12 Q. After they had met with him?

13 A. Right.

14 Q. Do you think that your relationship with
15 Dr. Trask is any different than any other student at
16 Duke?

17 A. You know, so with this information that I've
18 learned, I would say the same thing that I've learned
19 at a later date through counsel.

20 Q. About your relationship with Dr. Trask?

21 A. I would say that I do have a normal
22 relationship as any other student but it -- I was told
23 that he -- that he was in contact with the captains.

24 Q. I'm not trying to -- if you're telling me
25 something that you learned from your counsel, I'm not

1 trying to invade that. I'm not trying to pull that
2 information.

3 A. So your question, then, is do I have a
4 different relationship.

5 MR. MULLINS: Let me just instruct you.
6 First of all, listen to his question. Forget about
7 where you got the information. He asked you is your
8 relationship with Tallman Trask any different than any
9 other Duke student.

10 THE WITNESS: Okay.

11 MR. MULLINS: And you have a right to answer
12 that question. You don't have to say -- he's not
13 asking you where you heard information that you're
14 relying on to form this opinion --

15 THE WITNESS: I see.

16 MR. MULLINS: -- as far as all that.

17 THE WITNESS: Okay.

18 MR. MULLINS: He's just asking about the
19 relationship.

20 THE WITNESS: To that question I would answer
21 that I have a different relationship to Tallman Trask
22 than any given student.

23 BY MR. FALCONE:

24 Q. How so?

25 A. You know, with -- I'm honestly, you know,