

# **EXHIBIT 20**

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

EDWARD CARRINGTON, et al.,            )  
  )  
                                  Plaintiffs,    )  
  )  
vs.                                        ) No. 1:08-CV-00119  
  )  
  )  
DUKE UNIVERSITY, et al.,            )  
  )  
                                  Defendants.    )  
  )

Videotaped Deposition of  
JOHN JENNISON  
Thursday, February 16, 2012  
San Francisco, California

1 about whether that was going on?

2 A. Correct.

3 Q. When you said "a mysterious Durham Police  
4 Department computer hacking team," you are referring to  
5 the thought that they were getting into your e-mails,  
6 and then sending e-mails from them?

7 A. Correct.

8 Q. What does "CHT unit" mean?

9 A. I believe that was a humorous acronym for a  
10 computer hacking team.

11 Q. Was there an agreement among the team to stop  
12 sending e-mails, in light of the concern of the Durham  
13 Police Department?

14 MS. SMITH: I'm going to put an objection in  
15 here as to privilege, basically to the extent that any  
16 events that were involving legal instructions from  
17 Ekstrand and Ekstrand, as part of the joint defense  
18 agreement -- I would instruct you not to answer.

19 If they are separate from any information from  
20 us, or instruction from us, regarding his question,  
21 then you can answer it.

22 MR. THOMPSON: What she's saying is that if  
23 the lawyer has told you guys "Stop sending e-mails  
24 about these things," then that's privileged. But if  
25 you, the team, had a conversation that wasn't keyed off

1 cotton shirt?

2 A. No, I didn't.

3 Q. Did you later hear that someone had made a  
4 comment about a cotton shirt?

5 MS. SMITH: Again, I'm just going to renew the  
6 same objection, and instruct you not to answer if you  
7 only heard it in the context of your attorney-client  
8 relationship, or your relationship with Ekstrand and  
9 Ekstrand.

10 THE WITNESS: Yes, I believe that to be the  
11 case.

12 MR. FALCONE: Q. You never heard that through  
13 media reports?

14 A. I heard it through different media outlets,  
15 yes.

16 Q. What was your understanding, based on what was  
17 reported?

18 A. That someone had made some off-color comment  
19 regarding a cotton shirt, and some reference to one of  
20 the stripper's grandfathers being responsible for that  
21 shirt.

22 Q. Is the media report inaccurate?

23 A. In terms of what? In terms of...

24 Q. What you just told me.

25 A. No, I think that's in line with what I just