EXHIBIT D

1 (Pages 1 to 4)

	·		
	Page 1		Page 3
	IN THE UNITED STATES DISTRICT COURT	1	EXHIBITS
	FOR THE EASTERN DISTRICT OF PENNSYLVANIA		Redzic
		3	
			Exhibit Description
	DAVID RUDOVSKY and	4	No. 1 2008-2009 Pocket Part, Bates
	LEONARD SOSNOV,	5	West-R 02225 through 02501 (PAGE-77)
	Plaintiffs,	6	•
	No. 09-CV-727	7	No. 2 2007-2008 Pocket Part, Bates
	V.	8	West-R 01949 through 02223 (PAGE-80)
		9	
		10	No. 3 Redline comparison of the 2007-2008
	WEST PUBLISHING CORPORATION,	11	pocket part and the 2008-2009 pocket
	WEST SERVICES INC., AND	12	part (PAGE-85)
	THOMSON LEGAL AND REGULATORY	13	
	INC., t/a THOMSON WEST,	14	No. 4 Time Data Report, 1/1/07 through
	Defendants.	15	.12/31/09, Bates West-R 05866 through
		16	.05869 (PAGE-92)
		17	.03007 (I AGE-72)
	Video-recorded Deposition Upon Oral Examination of:	18	N - 5 A44
	Sarah Redzic		No. 5 Attorney Editor Activity
	Location: Thomson West .50 Broad Street East	19	Elements -Direct Time, Bates West-R 05943
	Rochester, New York 14614	20	through 05944 (PAGE-92)
	Date: March 3, 2010	21	
	Time: 9:09 a.m.	22	No. 6 Publishability Review, Bates
	Reported By: LYNN A. MULLEN, RPR	23	West-R 05980 through 06133 (PAGE-109)
	•	24	
	Page 2		Page 4
1	APPEARANCES	1	DOCUMENT REQUESTS
2	Appearing on Behalf of Plaintiffs:	2	
3	Noah H. Charlson, Esq.	3	Any e-mail communication to Karen or Amy
4	Bazelon, Less & Feldman, P.C.	4	advising them that the supplement was
5	.1515 Market Street, Suite 700	5	complete
6	Philadelphia, Pennsylvania 19102-1907	6	(By Mr. Charlson) (PAGE-64)
7	ncharlson@bazless.com	7	
8	114114115011 C C42145514 0111	8	Identity of publications that Ms. Redzic
9	Appearing on Behalf of Defendants:	9	worked on prior to October 2008 that
10	Aaron M. Zeisler, Esq.	10	involved criminal law
11	Satterlee, Stephens, Burke & Burke, LLP	11	(By Mr. Charlson) (PAGE-69)
12	.230 Park Avenue	12	(Dy MI. Charison) (LAGE-07)
1 4 4			•
	Novy Vouls Novy Vouls 10160	112	Editorial standard for have to almost
13	New York, New York 10169	13	Editorial standard for how to phrase
13 14	New York, New York 10169 azeisler@ssbb.com	14	instruction lines
13 14 15	azeisler@ssbb.com	14 15	<u> </u>
13 14 15 16	azeisler@ssbb.com Also Present:	14 15 16	instruction lines
13 14 15 16 17	azeisler@ssbb.com Also Present: John Wierzbicki	14 15 16 17	instruction lines
13 14 15 16 17 18	azeisler@ssbb.com . Also Present: John Wierzbicki Appearing as Videographer:	14 15 16	instruction lines
13 14 15 16 17	azeisler@ssbb.com Also Present: John Wierzbicki	14 15 16 17	instruction lines
13 14 15 16 17 18	azeisler@ssbb.com . Also Present: John Wierzbicki Appearing as Videographer:	14 15 16 17 18	instruction lines
13 14 15 16 17 18 19	azeisler@ssbb.com . Also Present: John Wierzbicki Appearing as Videographer:	14 15 16 17 18	instruction lines
13 14 15 16 17 18 19 20	azeisler@ssbb.com . Also Present: John Wierzbicki Appearing as Videographer: David Parrotta . WITNESS	14 15 16 17 18 19 20	instruction lines
13 14 15 16 17 18 19 20 21 22	azeisler@ssbb.com . Also Present: John Wierzbicki Appearing as Videographer: David Parrotta . WITNESS Name Page	14 15 16 17 18 19 20 21	instruction lines
13 14 15 16 17 18 19 20 21	azeisler@ssbb.com . Also Present: John Wierzbicki Appearing as Videographer: David Parrotta . WITNESS	14 15 16 17 18 19 20 21	instruction lines

2 (Pages 5 to 8)

Page 5 Page 7 1 IT IS HEREBY STIPULATED by and 1 they represent, after which our court 2 2 between the attorneys for the respective reporter will swear in the witness and we 3 parties that this deposition may be taken 3 may proceed. 4 by the Plaintiffs at this time pursuant 4 MR. CHARLSON: Noah Charlson; 5 to notice: 5 Bazelon, Less & Feldman, Philadelphia, for 6 IT IS FURTHER STIPULATED, that 6 the Plaintiffs. 7 7 all objections except as to the form of MR. ZEISLER: Aaron Zeisler; 8 8 the questions and responsiveness of the Satterlee, Stephens, Burke & Burke, New 9 answers, be reserved until the time of 9 York City, for the Defendants. And with 10 10 the trial: me is John Wierzbicki from West. 11 IT IS FURTHER STIPULATED, that 11 SARAH REDZIC, called herein as 12 12 the witness may read and sign the a witness, first being sworn, testified as 13 deposition and make any corrections to 13 follows: 14 same before any Notary Public within 30 14 EXAMINATION BY MR. CHARLSON: 15 days of receipt of the transcript; 15 Good morning, Ms. Redzic. Q. 16 IT IS FURTHER STIPULATED, that 16 A. Good morning. 17 the attorneys for the parties are 17 As you know, I'm counsel for Q. 18 individually responsible for their 18 the Plaintiffs in this action. I'll be 19 certified transcript charge, including any 19 asking you some questions today about 20 expedite or other related production 20 matters pertinent to this lawsuit. 21 charges in accordance with Rochester 21 A. Okav. 22 Rules. 22 And as you also probably know, 23 AND IT IS FURTHER STIPULATED. 23 your answers to our questions have to be 24 that the Notary Public, LYNN A. MULLEN, 24 verbal so that the court reporter can Page 8 Page 6 1 RPR, may administer the oath to the 1 take them down. 2 2 witness. If you don't understand a 3 THE VIDEOGRAPHER: We are about 3 question that I ask or you can't hear me, 4 to begin the video-recorded deposition of 4 please ask me to repeat it or rephrase 5 Sarah K. Redzic. I'm David Parrotta for 5 it, otherwise I'll assume that you heard 6 Alliance Court Reporting with an address 6 and understand the question and that all 7 of 183 East Main Street, Rochester, New 7 your answers are truthful, okay? 8 York. 8 A. 9 Today is Wednesday March 3, 9 Q. How are you currently employed? 10 .2010, and the time is 9:09 a.m. We're 10 I work at Thomson Reuters/West A. 11 at the offices of Thomson West located 11 Publishing. 12 at 50 Broad Street East, Rochester, New 12 And how long have you been Q. 13 York. 13 employed by Thomson Reuters? 14 The party the deposition is 14 Since October of 2007. A. 15 being taken by is the Plaintiff in the 15 Okay. And you are a law 16 action entitled David Rudovsky and Leonard school graduate, correct? 16 17 Sosnov, Plaintiffs, versus West Publishing 17 A. Yes. 18 Corporation, West Services, Incorporated 18 And you're admitted to the Bar? Q. 19 and Thomson Legal and Regulatory, 19 A. Yes. 20 Incorporated, t/a Thomson West, Defendants. 20 O. And did you graduate law school 21 In attendance is the court 21 in the spring of 2007? 22 reporter, Lynn Mullen of Alliance Court 22 In May of 2007, yes. A. 23 From University of Buffalo? Reporting. At this time the attorneys 23 Q. 24 will identify themselves and the parties 24 Yes. A.

4 (Pages 13 to 16)

	Page 13		Page 15
1		1	
1	know. Some states. About maybe half.	1 2	Q. Well, when you were hired as an
2	I would be speculating. I know		Attorney Editor, did you undergo training?
3	MR. ZEISLER: I'm going to	3	A. Yes.
4	direct you not to speculate.	4	Q. I assume you underwent training
5	THE WITNESS: Okay.	5	for things like how to use the computer
6	Q. Is that because West didn't	6	and the software systems and things like
7	publish for certain states, or your group	7	that?
8	only covered certain states?	8	A. Yes.
9	A. As far as I know, my group	9	Q. And did you undergo specific
10	only covered certain states.	10	training for the tasks that you were
11	Q. And are you still in the State	11	going to perform as an Attorney Editor?
12	Practice Group?	12	A. We were provided general
13	A. Yes.	13	guidelines, yes.
14	Q. Who do you report to?	14	Q. And what do you mean when you
15	A. Currently I report to Glenn	15	say you were provided with general
16	Guarino.	16	guidelines?
17	Q. And what is Mr. Guarino's	17	A. We were given paper files to
18	position?	18	look at, which provided guidelines for the
19	A. He's a Team Coordinator.	19	job.
20	Q. Who did you report to when you	20	Q. Guidelines for how to perform
21	first started at West?	21	the role of an Attorney Editor?
22	A. Catherine Smith.	22	A. Some of the roles. There were
23	Q. And when did your reporting	23	general guidelines, yes.
24	change?	24	Q. Do you know what the title of
	Page 14		Page 16
1	A. I believe at the end of 2009.	1	those files were?
2	Q. Do you know why that changed?	2	A. I don't know.
3	A. I don't know.	3	MR. CHARLSON: Aaron, do you
4	Q. Was Catherine Smith's position	4	know whether those documents were
5	that of Team Coordinator while you were	5	produced?
6	reporting to her?	6	MR. ZEISLER: I believe they
7	A. Yes.	7	were, yes.
8	Q. Do you know whether her	8	MR. CHARLSON: Okay. Thank
9	position is still Team Coordinator?	9	you.
10	A. I believe so.	10	Q. Did you undergo a specific
11	Q. Are you still in the same group	11	other than the paper files that you were
12	as Ms. Smith?	12	given, were you did you undergo any
13	A. No.	13	classroom training or one-on-one training
14	Q. She had been Team Coordinator	14	with with somebody else at West to go
15	for the State Practice Group?	15	through your task as an Attorney Editor?
16	A. Yes.	16	A. I was essentially shadowing, I
17	Q. And do you know which group	17	guess if that's the correct word a
18	she's in now?	18	person, and we were also provided a
19	A. I don't know.	19	mentor.
20	Q. When you were hired as an	20	Q. Was the person who you were
21	Attorney Editor, what kind of training did	21	shadowing the same as your mentor?
22	you undergo?	22	A. No.
23 24	A. Can you be more specific as far as "training"?	23 24	Q. And who were you shadowing when you first were hired as an Attorney

5 (Pages 17 to 20)

	Page 17		Page 19
1	Editor?	1	official they're mentoring relation
2	A. For the most part, Karen	2	I don't know how to describe that. There
3	Earley.	3	was no specified time.
4	Q. And how long did you shadow	4	Q. Do you still have a mentoring
5	Karen Earley for?	5	relationship with Ms. Nadel?
6	A. Over a course of several	6	A. No.
7	months.	7	Q. Is Ms. Nadel still employed at
8	Q. More than six months?	8	Thomson Reuters?
9	A. I don't know.	9	A. As far as I know, yes.
10	Q. And can you be a little more	10	Q. Was she an Attorney Editor?
11	specific what you mean by "shadowing"?	11	A. I believe so.
12	A. Basically she I was brought	12	Q. Do you know what group she was
13	into certain conversations; just she would	13	in?
14	loop me into conversations and talk about	14	A. No.
15	issues that came up in the products that	15	Q. Did Ms. Nadel provide any sort
16	she was working on, or she would ask me	16	of affirmative training to you, or was
17	to complete certain certain tasks that	17	she really just there to respond to your
18	she was working on.	18	questions?
19	Q. During this shadowing process,	19	MR. ZEISLER: Objection with
20	did you have any projects of your own	20	respect to the word "affirmative
21	independent of shadowing Ms. Earley?	21	training." It's vague, ambiguous.
22	A. I really don't recall.	22	Q. Did you understand the question?
23	Q. Did you share an office with	23	A. No.
24	Ms. Earley during this time?	24	Q. Did Ms. Nadel take steps to
	Page 18		Page 20
1	A. We didn't have offices at the	1	provide you with instruction in the
2	time.	2	process of becoming and performing the
3	Q. You were sitting in carrels?	3	tasks of an Attorney Editor?
4	A. Yes.	4	A. That's a very long can you
5	Q. Was your carrel adjacent to	5	be more specific or it's a very
6	hers?	6	long
7	A. I don't believe so.	7	Q. Well, I'm asking
8	Q. You said you were also assigned	8	A. I'm not really sure of what
9	a mentor?	9	you're asking.
10	A. Yes.	10	Q. Sure. Well, what I'm trying to
11	Q. And who was your mentor?	11	get at, Ms. Redzic, is whether Ms. Nadel
12	A. Andrea Nadel. I believe that's	12	took part in the process of providing you
13	her last name.	13	with training to become an Attorney
14	Q. And what was can you	14	Editor.
15	describe the mentoring process?	15	A. But I need you to define what
16	A. Basically we could go to her	16	"training" is. What do you mean by
I		1	
17	with any questions that we had. She was	17	"training"?
17 18		17 18	Q. Well, by "training" I mean
	with any questions that we had. She was		
18	with any questions that we had. She was there to answer any questions. Q. And did you go to Ms. Nadel	18	Q. Well, by "training" I mean
18 19	with any questions that we had. She was there to answer any questions.	18 19	Q. Well, by "training" I mean teaching you how to perform your job as
18 19 20	with any questions that we had. She was there to answer any questions. Q. And did you go to Ms. Nadel during your mentoring process? A. I believe so.	18 19 20	Q. Well, by "training" I mean teaching you how to perform your job as an editor of West legal publications. A. She may have.
18 19 20 21	with any questions that we had. She was there to answer any questions. Q. And did you go to Ms. Nadel during your mentoring process? A. I believe so.	18 19 20 21	Q. Well, by "training" I mean teaching you how to perform your job as an editor of West legal publications. A. She may have.

6 (Pages 21 to 24)

	Page 21	Τ	Page 23
			-
1	Q. Is it fair to say that Ms.	1	employed by Thomson Reuters?
2	Earley had more of a role in your	2	A. Yes.
3	training than Ms. Nadel did?	3	Q. Is in your understanding, is
4	A. Yes.	4	West part of Thomson Reuters?
5	Q. When you were hired, do you	5	A. As far as I understand, yes.
6	know whether there were other Attorney	6	Q. Do you consider yourself to be
7	Editors hired at the same time, sort of	7	someone who works for West Publishing?
8	an incoming class of editors?	8	MR. ZEISLER: I'm going to
9	A. Not really.	9	object to the extent you're in any way
10	Q. So were there	10	seeking a legal conclusion about the
11	MR. ZEISLER: Were you finished	11	corporate entities or who she works for.
12	with your answer?	12	If you're asking for her understanding,
13	A. I don't know. I don't know.	13	that's fine.
14	Q. Was there any sort of, you	14	A. As far as I understand, West is
15	know, presentation or seminar given to a	15	a part of Thomson Reuters, so
16	whole group of Attorney Editors that you	16	Q. So if I refer to West and your
17	were part of?	17	work for West
18	MR. ZEISLER: Objection. At	18	A. Yes.
19	the beginning when she first came or at	19	Q will that can we agree
20	any time?	20	on that?
21	Q. Well, let's break it out. At	21	A. Yes.
22	the beginning.	22	MR. ZEISLER: We can agree on
23	A. At the beginning, all I	23	that.
24	remember are individual sessions.	24	MR. CHARLSON: Okay. That's
	Page 22		Page 24
1	Q. Were there in the two-plus	1	all I'm getting at.
2	years that you've been here at Thomson,	2	Q. Are you aware of a term at
3	have there been training sessions or	3	West among Attorney Editors of being
4	presentations given to groups of Attorney	4	certified as an Attorney Editor?
5	Editors?	5	A. I'm not sure.
6	A. Yes.	6	Q. Do you know whether you are
7	Q. And can you describe those for	7	considered a certified Attorney Editor?
8	me?	8	A. Again, I don't know what
9	A. I can't describe anything in	9	"certified" means, so I can't tell you
10	detail. They're just attorney continuing	10	whether
11	education kind of guidelines that they	11	Q. Are you required to record your
12	would just provide us with additional	12	time spent performing tasks at West?
13	training with.	13	A. Yes.
14	Q. What sort of topics?	14	Q. Do you have to record all of
15	A. I don't recall off the top of	15	your time spent?
16	my head a specific the specifics of	16	A. At this point, yes.
17	each of them, of each session.	17	Q. Was there a point at which that
18	Q. Is there anything else you can	18	was not the case?
1 0	tall ma about your training to become an	19	A. Yes.
19	tell me about your training to become an		0 1111 1 2
20	Attorney Editor at West?	20	Q. When was that?
20 21	Attorney Editor at West? A. No.	20 21	A. That was up to the 1st of this
20 21 22	Attorney Editor at West? A. No. Q. Are you aware of the term used	20 21 22	A. That was up to the 1st of this year.
20 21	Attorney Editor at West? A. No.	20 21	A. That was up to the 1st of this

8 (Pages 29 to 32)

1	Page 29		Page 31
	Q. Approximately when was that	1	right?
2	conversation?	2	MR. ZEISLER: Mischaracterizes
3	A. It was toward the toward the	3	her testimony.
4	end of 2008 sometime.	4	You can answer.
5		5	
	•	6	A. I'm not sure what you mean by
6 7	that conversation?	7	"internal." There was a deadline, and
	A. With well, with respect to		that's all I knew about it, so
8	what?	8	Q. Well, did somebody else
9	Q. With respect to the entire	9	whose deadline was it, Ms. Redzic?
10 11	conversation.	10	A. Again, that's I'm not sure
	A. We we talked about the	11	how the deadlines were set and who set
12	status of the book and what needed to be	12	them. I wasn't involved with making that
13	done for it.	13	decision. But we have a schedule, and
14	Q. And what is your recollection	14	per that schedule there was a deadline,
15	about what the status of the book was at	15	80
16	that time?	16	Q. And was you said actually
17	A. I believe that I the book	17	that at this conversation the manuscript
18	the book was overdue. It had a due	18	was overdue; is that correct?
19	date at for us to have a manuscript	19	A. Yes.
20	in-house and that we needed to we had	20	Q. So there had already been a
21	a deadline to finish and that we needed	21	deadline that had been missed for the
22	to find a way to meet that deadline and	22	supplement?
23	produce and produce the title.	23	A. I don't I don't believe
24	Q. Do you recall approximately how	24	I don't know. I don't believe so. I
	Page 30		Page 32
1	far away the deadline was at the time	1	don't know what you mean.
2	that you had your meeting with Catherine	2	Q. Well, I'm using your word, Ms.
3	Smith?	3	Redzic. You said the book was overdue,
4	A. Not specifically.	4	correct?
5	Q. Was it a month or less than a	5	A. Yes.
6	month?	6	Q. And that means that it had
7	A. I I'm not again, I'm not	7	already been due and hadn't been turned
8	sure specifically.	8	in, right?
9	Q. Do you know who established	9	A. Yes.
. –	that internal deadline?	10	O Do you know how overdue it was
10	that internal acadime.		Q. Do you know how overdue it was
_	MR. ZEISLER: Objection.	11	Q. Do you know how overdue it was at that point?
10			at that point?
10 11	MR. ZEISLER: Objection. A. I don't know.	11	at that point? A. I not specifically, no.
10 11 12	MR. ZEISLER: Objection.A. I don't know.Q. Was that a deadline that was	11 12	at that point? A. I not specifically, no. Q. But is it fair to say there
10 11 12 13	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when	11 12 13	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the
10 11 12 13 14	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out	11 12 13 14	at that point? A. I not specifically, no. Q. But is it fair to say there
10 11 12 13 14 15	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers?	11 12 13 14 15	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes.
10 11 12 13 14 15 16	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can	11 12 13 14 15 16	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms.
10 11 12 13 14 15 16 17	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can you clarify?	11 12 13 14 15 16 17	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms. Smith discuss about what had to be done?
10 11 12 13 14 15 16 17 18	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can you clarify? Q. Well, you said that your	11 12 13 14 15 16 17 18	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms. Smith discuss about what had to be done? A. We discussed the possibility of
10 11 12 13 14 15 16 17 18 19 20	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can you clarify? Q. Well, you said that your conversation with Ms. Smith involved a	11 12 13 14 15 16 17 18 19 20	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms. Smith discuss about what had to be done? A. We discussed the possibility of finding finding a contractor to
10 11 12 13 14 15 16 17 18 19 20 21	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can you clarify? Q. Well, you said that your conversation with Ms. Smith involved a discussion of an impending internal	11 12 13 14 15 16 17 18 19 20 21	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms. Smith discuss about what had to be done? A. We discussed the possibility of finding finding a contractor to possibly initially do that, I believe, and
10 11 12 13 14 15 16 17 18 19 20 21	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can you clarify? Q. Well, you said that your conversation with Ms. Smith involved a discussion of an impending internal deadline?	11 12 13 14 15 16 17 18 19 20 21 22	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms. Smith discuss about what had to be done? A. We discussed the possibility of finding finding a contractor to possibly initially do that, I believe, and I yes.
10 11 12 13 14 15 16 17 18 19 20 21	MR. ZEISLER: Objection. A. I don't know. Q. Was that a deadline that was based on when publication well, when the supplement would need to be sent out to subscribers? A. What do you mean by that? Can you clarify? Q. Well, you said that your conversation with Ms. Smith involved a discussion of an impending internal	11 12 13 14 15 16 17 18 19 20 21	at that point? A. I not specifically, no. Q. But is it fair to say there was a sense of urgency to get the supplement prepared? A. Yes. Q. And so what did you and Ms. Smith discuss about what had to be done? A. We discussed the possibility of finding finding a contractor to possibly initially do that, I believe, and

9 (Pages 33 to 36)

Page 33 Page 35 1 1 I mean a person that we hire And so out of West's entire 2 2 who -- from the outside of the company to database of contractors, you were not able 3 3 complete the update. to make contact with anybody about 4 preparing a supplement to the 2000 -- to Q. Would that typically -- well, 4 5 when you talked about finding a 5 Pennsylvania Criminal Procedure for 6 contractor, were you considering finding a 6 2008-2009? 7 7 practicing attorney who could do it or --MR. ZEISLER: Objection. 8 is that the sort of thing you were 8 Not -- I don't know about the 9 considering? 9 entire database. I wasn't able to make 10 10 MR. ZEISLER: Objection. -- to be in touch with people who I 11 11 called. You can answer. 12 Contractors are people who we 12 Q. Okay. Going back to that A. 13 hired from outside of the company. Some conversation that you had with Catherine 13 14 of them are practicing attorneys, some of 14 Smith, you had said you talked about the 15 them are legal writers. Again, you know, 15 possibility of finding a contractor. Did 16 I don't -- specifically I don't recall. 16 you discuss other options at that meeting? 17 And you said you discussed the 17 A. Yes. 18 possibility. Did you reach a decision 18 O. What were the other options 19 about whether or not to get a contractor 19 that you discussed? 20 I said that I may have some at that time? 20 21 21 time to devote to the project. A. I actually -- no, we actually 22 were unable to find anyone to do that, so Any other options that were 22 Q. 23 I believe that was -- that was the 23 discussed? 24 24 discussion. A. No. Page 34 Page 36 1 1 Just so I'm clear, Ms. Redzic, So who was responsible for 2 2 trying to locate a contractor? at that meeting was it your understanding 3 3 A. I was. that West was intending to publish a 4 4 supplement for 2008-2009 to the Q. Okay. But you were not able 5 to do so? 5 Pennsylvania Criminal Procedure volume? 6 6 MR. ZEISLER: Objection. Vague That's right. A. What steps did you take to try 7 7 O. with respect to "at that time." to identify a contractor? 8 8 THE WITNESS: I'm sorry, could 9 A. We have a database of 9 you repeat that? 10 contractors, and I believe I pulled some 10 MR. ZEISLER: Objection. Vague 11 names from that database. with respect to "at that time." 11 12 12 Q. And what did you do with those A. Can you be more specific with 13 names? 13 your question? 14 14 Well, the only reason it's A. I tried to get in touch with Q. 15 15 those people. vague is because we don't know from you 16 And were you able to get in 16 when that meeting took place, but it is 17 touch with anybody? 17 that meeting with Catherine Smith that I'm 18 18 referring to. A. 19 Over how long a period of time 19 MR. ZEISLER: That's fine, Q. 20 20 were you trying to get in touch with Counselor. 21 these contractors? 21 MR. CHARLSON: Okay. 22 I don't remember specifically. 22 A. I mean, for whatever -- I guess 23 A couple of weeks. Maybe less, maybe 23 if you're referring to whenever we talked, 24 more. I don't know. 24 yes.

10 (Pages 37 to 40)

	Page 37		Page 39
	_		
1	Q. At the conclusion of that	1	THE WITNESS: Okay.
2	meeting with Catherine Smith, what was	2	Q. You just testified about a
3	your understanding of what your next steps	3	meeting that you had with Catherine Smith
4	were to be with respect to the	4	sometime towards the end of 2008 where
5	supplement? And I'm just going to refer	5	you discussed the status of the book
6	to "the supplement," but I I want you	6	A. Yes.
7	to understand that we're talking about the	7	Q and what needed to be done,
8	supplement to Pennsylvania Criminal	8	and you testified that you understood from
9	Procedure for 2008-2009.	9	Ms. Smith that the book was overdue, that
10	A. Okay.	10	you needed to get a manuscript, you had
11	MR. ZEISLER: And to be	11	to meet the deadline, and that you
12	extremely clear, we're talking about the	12	discussed the possibility of finding a
13	December 2008-2009 supplement?	13	contractor to complete the update.
14	MR. CHARLSON: Well, I'm	14	MR. ZEISLER: Objection.
15	talking about what eventually became	15	Compound. Misstates her testimony.
16	the 2008 the December 2008 supplement.	16	A. Could you ask one question at a
17	MR. ZEISLER: Right. Okay.	17	time, please?
18	Just so we're clear. Not another	18	Q. Well, do you recall that
19	supplement, not an April supplement, not	19	meeting?
20	something else?	20	A. Yes.
21	MR. CHARLSON: It's my	21	Q. Okay. And it's also my
22	understanding that Ms. Redzic worked on	22	understanding from your testimony a few
23	that supplement, and that's what I'm	23	minutes ago that when you left that
24	talking about.	24	meeting, you undertook to try to locate a
	Page 38		Page 40
1	MR. ZEISLER: That's fine. I	1	contractor to complete the supplement; is
2	just wanted to be clear which supplement,	2	that correct?
3	just for the record.	3	MR. ZEISLER: Objection.
4	A. Okay.	4	A. No, that's not correct.
5	Q. So what was your understanding,	5	Q. Okay. Then can you tell me
6	Ms. Redzic, of what your next steps were	6	what I have misstated?
7	with respect to the supplement when you	7	MR. ZEISLER: Objection.
8	left that meeting?	8	A. I mean what are you
9	A. My understanding is I would be	9	referring to? What
10	completing the update.	10	Q. At some point
11	Q. Well, let me back up. The	11	A. Yes.
12	first meeting you were talking about, you	12	Q Ms. Redzic, you tried to
13	discussed the possibility of finding	13	contact contractors
14	contractors?	14	A. Yes.
15	A. Which first meeting? I don't	15	Q from the database, right?
16	I don't know how many meetings there	16	A. Yes.
17	were. I don't know what's the first	17	Q. And it was my understanding
18	meeting. It's a conversation that we	18	from your testimony that you did that
19	had. I	19	after speaking with Catherine Smith?
		20	A. Yes.
20	Q. How many meetings well,	20 21	A. Yes. O Okay And at that conversation
20 21	Q. How many meetings well, let's back up. You just testified	21	Q. Okay. And at that conversation
20 21 22	Q. How many meetings well,let's back up. You just testifiedA. Yes.	21 22	Q. Okay. And at that conversation with Catherine Smith where you got the
20 21	Q. How many meetings well, let's back up. You just testified	21	Q. Okay. And at that conversation

17 (Pages 65 to 68)

	17 (Pages	1	10 66)
	Page 65		Page 67
1	clear and you can continue to ask the	1	A. Again, do you mean independently
2	witness any question you'd like she	2	just written?
3	testified that she reviewed her documents	3	Q. First of all, independently had
4	and provided them to counsel.	4	you done anything with respect to criminal
5	A. I did. On several occasions	5	law or criminal procedure?
6	went through all of my files, so	6	A. And you mean complete do you
7	Q. Ms. Redzic, was there a	7	mean I'm just writing a complete update
8	specific is there a specific guideline	8	without any supervision or any is that
9	document for preparing a supplement to a	9	what you mean?
10	topical treatise that you were referencing	10	Q. That's the first question.
11	in connection with your work on the 2000	11	A. Yes.
12	the December 2008 supplement?	12	Q. You had?
13	MR. ZEISLER: Objection.	13	A. Oh, I'm sorry, no.
14	Vague. But	14	Q. Had you reviewed in your
15	A. Can you be more specific as far	15	role as Attorney Editor, had you reviewed
16	as	16	somebody else's work with respect to
17	Q. Is there an internal West	17	criminal law at that point?
18	document that provides you with specific	18	A. Criminal law in general?
19	guidance on how you were to go about the	19	Q. Criminal procedure.
20	process of updating the Pennsylvania	20	A. Criminal procedure in general?
21	Criminal Practice treatise for 2008-2009?	21	Q. Yes.
22	A. At that point I'm not aware of	22	A. Yes.
23	any I wasn't aware of any such	23	Q. And what works were those?
24	document.	24	A. I'm responsible for several
	Page 66		Page 68
1	Q. In well, did you speak with	1	titles in Pennsylvania and in Missouri,
2	anybody at West about how you should go	2	and both of those both of those have
3	about the process of updating the	3	treatises which cover criminal law.
4	treatise?	4	Q. And you had worked on those
5	A. As far as I recall, no.	5	updates prior to October of 2008?
6	Q. Did Catherine Smith give you	6	A. I worked on them as an Attorney
7	any guidance and suggest to you, you	7	Editor, yes.
8	know, what sort of things you should do	8	Q. What are those titles?
9	to update the treatise?	9	A. I I I'd have to go look
10	MR. ZEISLER: Objection.	10	up my titles, specific book titles.
11	A. As far as I know, no.	11	Q. So you, as an Attorney Editor,
12	Q. Did you go to Karen Earley and	12	were working on are we talking about
13	ask her for any guidance in what to do	13	withdrawn.
14	to update the treatise?	14	We're talking about supplements?
15	A. I don't believe so.	15	Or you're talking about supplements?
16	Q. What about your mentor, Andrea	16	A. Some of them are supplements.
17	Nadel?	17	I believe some of them are pamphlets,
18	A. No.	18	SO
19	Q. At this point that we're	19	Q. And with respect to the
20	talking about, while you were working on	20	Pennsylvania and Missouri criminal
21	the 2008 supplement, had you had you	21	products, were you reviewing other
22	yourself prepared any works relating to	22	people's work or, I'm sorry, editing
23	criminal law or criminal procedure?	23	other people's work?
24	MR. ZEISLER: Objection.	24	A. I believe so, yes.

18 (Pages 69 to 72)

Page 69 Page 71 1 1 Q. And do you know how many A. I can't give you specifics. I 2 2 separate works you had worked on prior to know I'm responsible for numerous titles 3 October 2008 that involved criminal law? 3 and, you know, you work on them. There's 4 A. Not specifically, no. 4 issues and there's things you have to 5 MR. CHARLSON: Well, Aaron, I'd 5 take care of throughout the year, so it 6 could be all, it could be some. I don't certainly like the identity of those 6 7 7 publications that Ms. Redzic is referring remember. 8 8 Q. Do you know how many titles you 9 MR. ZEISLER: I'll take it 9 were responsible for at that period of 10 10 time, October 2008? under advisement. 11 MR. CHARLSON: Actually, I 11 A. I believe between 60 or 70. 12 Is that the same number you're think what we'll do is, before we finish 12 13 13 responsible for now roughly? with Ms. Redzic, with your permission, 14 Aaron, I'd love to have her go back and 14 A. Roughly, yes. 15 15 Of those 60 or 70 titles, can actually get that answer so we don't have 16 to follow up later. 16 you estimate how many of them are -- were 17 MR. ZEISLER: I think we can 17 treatises that required -- or any kind of 18 follow up later. We're here as a 18 publication that required an annual pocket 19 courtesy to you at West's offices to do 19 part? 20 20 this deposition. She's in this room I believe most of them -- well, 21 right now, and we'll continue with the 21 for pocket part publications -- well, for 22 deposition. But I will, of course, take 22 treatises with pocket parts, most of them 23 your request under advisement to provide 23 are, I believe, updated yearly. 24 the information at an appropriate time. 24 Q. And had the pocket parts for Page 70 Page 72 1 1 About how much time did you most of those titles been prepared already 2 spend working on the 2000 -- the December 2 and submitted at the time you were working on the Pennsylvania Criminal 3 3 2008 supplement? 4 A. I can't really give any 4 Procedure? 5 5 specifics of that. It's just a span of MR. ZEISLER: Objection. 6 several -- I don't know, a few weeks. I A. I don't know. I mean, it's --6 7 can't -- I don't know the specifics of 7 I don't know my specific schedule of 8 8 specific books. There are a lot of the time. 9 9 books, so I don't... Q. A few weeks working on it all 10 10 Q. Well, what I'm trying to get day every day or --11 A. I don't believe so, no. 11 at, Ms. Redzic, at the same time you were 12 MR. ZEISLER: Let him finish 12 working on Pennsylvania Criminal Procedure, 13 his question. 13 there were other annual pocket parts that 14 Q. You don't believe so? 14 you were working on getting to 15 A. All day every day for three 15 Manufacturing? 16 weeks? I don't -- I don't -- I don't A. I believe so, yes. And again, 16 17 in my Attorney Editor capacity. I just think so. 17 18 Q. Did you have other publications 18 want to clarify that. Not in any sort 19 that you were responsible for working on of individual writing. 19 20 at that period of time? 20 Q. Well, you said a couple times now in your "Attorney Editor capacity." 21 In my capacity as an Attorney 21 A. 22 22 A. Yes. Editor, yes. 23 23 Q. What products were you working Did you have some other 24 on at that time? 24 capacity at West that you were doing work

19 (Pages 73 to 76)

		13	10 70)
	Page 73		Page 75
1	in?	1	say. Let him ask a clear question, and
2	A. No.	2	you can give an answer.
3	Q. Just so you're just	3	Q. You said you were to prepare an
4	differentiating between your role as an	4	update that was sufficient. Sufficient
5	editor to edit another author's work and	5	for what?
6	the work you were doing on this	6	A. For publication.
7	supplement where you were doing the work	7	Q. Did you have an understanding
8	yourself?	8	at the time of who the audience the
9	A. That's correct.	9	readership for this treatise was?
10	Q. Now, you said you KeyCited the	10	A. I don't know the specific
11	cases that you had been given from the	11	people who purchase the book, so if
12	2007-2008 supplement?	12	you're asking for for specifics, I'm
13	A. I believe so, yes.	13	Q. While you were working on the
14	Q. Is there a record kept of your	14	update, did you ask anybody who West
15	KeyCiting work?	15	understood the audience, the readership of
16	A. I don't I don't believe so.	16	this book, to be?
17	Q. Who would know the answer to	17	A. I don't believe so, no.
18	that question?	18	Q. Did you have any understanding
19	A. I would know.	19	of what the purpose of the book was or
20	Q. Do you know whether you have	20	what the purpose of the book was of what the readership used it for?
21	the ability to go back and see what	21	A. I have my own personal
22	searches you did?	22	
23	-	23	understanding, but I can't guess and
24	A. As far as I know, I don't think so.	24	speculate as to who the people are and
24		24	what they're going to use the book for,
	Page 74		Page 76
1	Q. Okay. When you when you	1	so
2	completed the 2008 supplement, was it	2	Q. And in your view, what or
3	reviewed by anybody?	3	in your judgment, what would have made
4	A. No.	4	the supplement sufficient for publication?
5	Q. So as far as you know, it just	5	MR. ZEISLER: Objection.
6	went straight to Manufacturing?	6	A. You have to be more you
7	A. It went straight to be	7	have to be give me specific I
8	processed, yes, for	8	don't know what you're trying to say.
9	Q. When you were working on the	9	Q. Well, does West have
10	December 2008 supplement, what was your	10	publishability guidelines?
11	understanding of what it is you were	11	A. I believe so, yes.
12	trying to accomplish?	12	Q. And did you reference those
13	A. My understanding was that I was	13	publishability guidelines while you were
14	supposed to provide the provide an	14	preparing the 2008 supplement?
15	update, provide an update in a certain	15	A. I'm aware of them, so I
16	amount of time that in our judgment would	16	while I was working on it. In that
17	be sufficient and I don't know what	17	respect, yes.
18	else what else do you want me to do,	18	Q. And what's your understanding of
19	say?	19	what the publishability guidelines require
20	Q. I want you to answer my	20	for a topical treatise update?
21	question.	21	MR. ZEISLER: Objection.
22	MR. ZEISLER: Listen to his	22	A. Again, that really depends
23	question and answer his question. You	23	the guidelines are general guidelines, and
24	don't have to guess what he's trying to	24	they're you know, they're depends

21 (Pages 81 to 84)

	- 01		
	Page 81		Page 83
1	and answered.	1	Q. In fact, Ms. Redzic, it is
2	A. I believe so, yes.	2	different, right? In Redzic 2, for
3	Q. I'll ask you just to turn	3	example, the 2007-2008 supplement, in
4	to page West-R 01965, and that's in	4	section 1.7 the language, "[Comment, first
5	Redzic 2. And while keeping that page,	5	paragraph, line 3, after 'rule 102).'
6	I'd ask you to turn back to the page we	6	add:]" has been changed to "Add to
7	were just looking at in Redzic 1, which	7	comment, first paragraph, line 3, after
8	is 02241.	8	'rule 102).':", right?
9	A. Okay.	9	MR. ZEISLER: Objection. The
10	Q. And I'm comparing, Ms. Redzic,	10	document speaks for itself. This isn't a
11	the instruction line that we were looking	11	
12		12	reading test.
13	at in Redzic 1, which said, "Add the	13	But you can answer.
	following at end of comment," to the		A. Yes.
14	instruction line in Redzic 2 at the same	14	Q. And nobody but you would have
15	location prior to the last paragraph in	15	made that change, right?
16	Section 1.6 I'm sorry, 1.4, and it	16	MR. ZEISLER: Objection. Calls
17	looks to me, Ms. Redzic, like the	17	for speculation.
18	phrasing of the instruction line was	18	A. As far as I know.
19	changed between the earlier supplement and	19	Q. And you are welcome, Ms.
20	the later supplement. Do you see that?	20	Redzic, to look through these two
21	A. Yes.	21	documents, but is it fair to say that
22	Q. In the '07 supplement it says	22	throughout this document the phraseology
23	the instruction line reads, "At end of	23	of the instruction lines were changed from
24	comment, add:", all in brackets, and in	24	the '07-'08 to the '08-'09 supplement?
	Page 82		Page 84
1	the '08-'09 pocket part it reads no	1	MR. ZEISLER: Objection. This
2	brackets "Add the following at end of	2	document is over a hundred pages long,
3	comment:" Do you see that?	3	and Ms. Redzic is not going to sit here
4	A. Yes.	4	and adopt your representation as to how
5	Q. Did you make that change?	5	every comment was or was not changed.
6	A. I honestly don't remember.		
		1 6	
7		6	The documents speak for themselves.
7 8	Q. Would anybody besides you have	7	The documents speak for themselves. Anybody can compare them.
8	Q. Would anybody besides you have made that change?	7 8	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could
8 9	Q. Would anybody besides you have made that change?A. I don't believe so, no.	7 8 9	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been
8 9 10	Q. Would anybody besides you have made that change?A. I don't believe so, no.Q. Okay. And just keeping on the	7 8 9 10	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but
8 9 10 11	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look 	7 8 9 10 11	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I
8 9 10 11 12	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 	7 8 9 10 11 12	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written
8 9 10 11 12 13	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. 	7 8 9 10 11 12	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out
8 9 10 11 12 13	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that 	7 8 9 10 11 12 13	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed
8 9 10 11 12 13 14 15	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that the phrasing of the instruction lines was 	7 8 9 10 11 12 13 14 15	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed you how you could do a redline, so don't
8 9 10 11 12 13 14 15	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that the phrasing of the instruction lines was changed in form, although I think we can 	7 8 9 10 11 12 13 14 15 16	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed you how you could do a redline, so don't try to pepper the record with subjective
8 9 10 11 12 13 14 15 16 17	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that the phrasing of the instruction lines was changed in form, although I think we can agree not in substance? 	7 8 9 10 11 12 13 14 15 16	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed you how you could do a redline, so don't try to pepper the record with subjective comments from yourself as to what was or
8 9 10 11 12 13 14 15 16 17	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that the phrasing of the instruction lines was changed in form, although I think we can agree not in substance? MR. ZEISLER: Objection. The 	7 8 9 10 11 12 13 14 15 16 17	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed you how you could do a redline, so don't try to pepper the record with subjective comments from yourself as to what was or was not done to facilitate your
8 9 10 11 12 13 14 15 16 17 18	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that the phrasing of the instruction lines was changed in form, although I think we can agree not in substance? MR. ZEISLER: Objection. The document speaks for itself. 	7 8 9 10 11 12 13 14 15 16 17 18	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed you how you could do a redline, so don't try to pepper the record with subjective comments from yourself as to what was or was not done to facilitate your deposition. You already told me in
8 9 10 11 12 13 14 15 16 17 18 19 20	 Q. Would anybody besides you have made that change? A. I don't believe so, no. Q. Okay. And just keeping on the same page there, Ms. Redzic, if you look at 1.7 A. Sure. Q and 1.8, do you see that the phrasing of the instruction lines was changed in form, although I think we can agree not in substance? MR. ZEISLER: Objection. The document speaks for itself. A. Are you talking about okay. 	7 8 9 10 11 12 13 14 15 16 17 18 19 20	The documents speak for themselves. Anybody can compare them. MR. CHARLSON: Well, this could have been facilitated had a redline been produced as requested, but MR. ZEISLER: Mr. Charlson, I believe you told me in a written correspondence that you had figured out how to do a redline after I instructed you how you could do a redline, so don't try to pepper the record with subjective comments from yourself as to what was or was not done to facilitate your deposition. You already told me in writing that you could do a redline and
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	22		22	
24 series - 24 half hours. Do you know what those	23	• •	23	of 2008, and it's a total of two and a
21 Series 27 Hall Hours. Do you know what those	24	series	24	half hours. Do you know what those

26 (Pages 101 to 104)

	Page 101		Page 103
1	entries were for?	1	record your time, correct?
2	A. Not specifically.	2	MR. ZEISLER: Objection. Asked
3	Q. Would it be your practice, Ms.	3	and answered.
4	Redzic, to code your time seeking	4	A. I guess so, yes.
5	contractors as pre-production?	5	Q. And you made an attempt to be
6	A. I again, I don't that	6	as accurate as possible in recording your
7	depends on the that depends on the	7	time, correct?
8	book. I that depends on the	8	A. Within the guidelines that I
9	situation.	9	was provided by the company at the time,
10	Q. Okay. Well, in West Exhibit 5,	10	yes.
11	Activity Code 310 for "Pre-production" is	11	Q. And did those guidelines provide
12	described as "Activities preceding receipt	12	for you to accurately record your time
13	of manuscript from author, including:	13	spent on particular projects?
14	Selecting topics or planning content for	14	MR. ZEISLER: Objection.
15	particular releases; requesting plant from	15	A. I believe that I already
16	pub specialist to send to author; meetings	16	answered that we were required to enter
17	to discuss specifics of a particular	17	up to 40 hours in our of our time.
18	release; initial communication with	18	Anything after that, we did not. We
19	author/contractor regarding due dates;	19	we were not supposed to enter. So again,
20	following up with authors to insure timely	20	within those guidelines, my time should be
21	manuscript delivery; communicating with	21	correct.
22	author/contractor regarding content."	22	Q. And in approximately October of
23	Reading that, does that refresh	23	2008, were you spending more than 40
24	your recollection as to whether you coded	24	hours a week working on your projects as
	Page 102		Page 104
1	your time spent seeking a contractor to	1	an Attorney Editor?
2	pre-production?	2	A. From what I recall, I believe
3	A. No.	3	so, yes.
4			
	O Time that you spent actually	4	
	Q. Time that you spent actually working on the research of the supplement	4 5	Q. And did you did you record
5	working on the research of the supplement,	5	Q. And did you did you record that in those extra hours in any way?
5 6	working on the research of the supplement, would that time have been spent coded	5 6	Q. And did you did you record that in those extra hours in any way? MR. ZEISLER: Objection. Asked
5 6 7	working on the research of the supplement, would that time have been spent coded to pre-production?	5 6 7	Q. And did you did you record that in those extra hours in any way? MR. ZEISLER: Objection. Asked and answered.
5 6	working on the research of the supplement, would that time have been spent coded to pre-production? A. I don't remember.	5 6	Q. And did you did you record that in those extra hours in any way? MR. ZEISLER: Objection. Asked and answered. A. Again, they're recorded in here.
5 6 7 8 9	working on the research of the supplement, would that time have been spent coded to pre-production? A. I don't remember. Q. Would that be your practice?	5 6 7 8 9	 Q. And did you did you record that in those extra hours in any way? MR. ZEISLER: Objection. Asked and answered. A. Again, they're recorded in here. Anything above and beyond that is not
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5 6 7 8 9 10	working on the research of the supplement, would that time have been spent coded to pre-production? A. I don't remember. Q. Would that be your practice? A. Again, it's case-specific. I mean, these are vague. These guidelines	5 6 7 8 9 10	 Q. And did you did you record that in those extra hours in any way? MR. ZEISLER: Objection. Asked and answered. A. Again, they're recorded in here. Anything above and beyond that is not recorded. Q. So sitting here today and
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	working on the research of the supplement, would that time have been spent coded to pre-production? A. I don't remember. Q. Would that be your practice? A. Again, it's case-specific. I mean, these are vague. These guidelines are guidelines, and they're very broad. So, again, it's case-specific. Q. Ms. Redzic, is I think we established earlier that recording your time is part of your job responsibilities as an Attorney Editor at West, correct? MR. ZEISLER: Objection. Mischaracterizes previous testimony. A. I don't I don't know that I said that it's part of my job	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. And did you did you record that in those extra hours in any way? MR. ZEISLER: Objection. Asked and answered. A. Again, they're recorded in here. Anything above and beyond that is not recorded. Q. So sitting here today and looking at West Exhibit 4 and West Exhibit 5, you can't say what the two and a half hours you spent on October 20th and 21st were devoted to, correct? A. Correct. Q. Is it fair to say that you would have that you were would have been contacting contractors before you started the actual work on the supplement? A. I believe so, yes.

27 (Pages 105 to 108)

	Page 105		Page 107
1	and a half hours to "Other Production."	1	to speculate. I don't want you to guess.
2	Do you see that?	2	If you remember, you remember. If you
3	A. Yes.	3	don't, you don't.
4	Q. And "Other Production" on	4	A. Yeah.
5	Exhibit 5 is described as	5	Q. So this refreshes your
6	"Revising/editing/rewriting unpublishable	6	recollection, right?
7	manuscript after pub review; original	7	A. Yes.
8	writing for incorporation into a	8	Q. Okay. So her first there's
9	publication; performing any research	9	an entry for Ms. Nortier on October 31,
10	necessary for the original writing;	10	2008, that says "Clean Up Text and Coding
11	creating research references;	11	Error." Do you see that?
12	modifying/updating existing research	12	A. Yes.
13	references; adding new material into	13	Q. To your knowledge, would Ms.
14	previously pub-reviewed manuscript due to	14	Nortier have been looking at or working
15	existence of newly available material or	15	on your manuscript of the supplement
16	changes in the law; determining where in	16	before you were done with it?
17	a cumulative supplement or database	17	A. I have absolutely no idea.
18	specific headnotes or updates should be	18	Q. Well, would you have told her
19	inserted; writing instructions and vendor	19	did you tell her about it did you
20	specifications;, correcting/compiling	20	tell her to look at it before you were
21	manuscript obtained from multiple	21	done with it?
22	contributors."	22	A. Look at it with respect to
23	Seeing that, Ms. Redzic, does	23	what?
24	that refresh your recollection as to	24	Q. Well, you earlier testified that
	Page 106		Page 108
1	whether your entries on October 29th and	1	when you had completed the draft, you
2	November 3rd reflect your time spent	2	saved it and then told Karen Nortier that
3	doing the actual research and writing of	3	it was done.
4	the 2008 supplement?	4	A. Yes.
5	MR. ZEISLER: Objection.	5	Q. Did you tell Ms. Nortier that
6	A. No.	6	it was available for her before you were
7	Q. Do you know whether that time	7	done with it?
8	spent on October 29th and November 3rd	8	A. I don't remember.
9	was devoted to the actual research and	9	Q. Looking at this document and
10	updating of the 2008 supplement?	10	comparing your time records to Ms.
11	A. Again, I don't remember.	11	Nortier's time records, do you reach the
12	Q. Let me show you let me	12	conclusion that by October 31st you had
13	direct your attention, Ms. Redzic, to	13	completed your first draft of the
14	about the middle of that same page	14	supplement?
15	A. Yes.	15	A. I can't reach any conclusion
16			based on this.
	O West 05867. There's an	110	based on this.
17	Q West 05867. There's an entry for somebody named Karen Nortier.	16 17	
17 18	entry for somebody named Karen Nortier.	17	Q. Can you what's your
18	entry for somebody named Karen Nortier. A. Okay.	17 18	Q. Can you what's your understanding exactly let me say it
18 19	entry for somebody named Karen Nortier.A. Okay.Q. Is Karen Nortier the woman whom	17 18 19	Q. Can you what's your understanding exactly let me say it differently.
18 19 20	entry for somebody named Karen Nortier. A. Okay. Q. Is Karen Nortier the woman whom you testified earlier you sent the or	17 18 19 20	Q. Can you what's your understanding exactly let me say it differently. What's your understanding of
18 19	entry for somebody named Karen Nortier. A. Okay. Q. Is Karen Nortier the woman whom you testified earlier you sent the or got the manuscript after you?	17 18 19	Q. Can you what's your understanding exactly let me say it differently. What's your understanding of what Ms. Nortier's role is?
18 19 20 21	entry for somebody named Karen Nortier. A. Okay. Q. Is Karen Nortier the woman whom you testified earlier you sent the or got the manuscript after you? A. I believe so, I guess. Not	17 18 19 20 21	Q. Can you what's your understanding exactly let me say it differently. What's your understanding of what Ms. Nortier's role is? A. She processes the manuscript.
18 19 20 21 22	entry for somebody named Karen Nortier. A. Okay. Q. Is Karen Nortier the woman whom you testified earlier you sent the or got the manuscript after you?	17 18 19 20 21 22	Q. Can you what's your understanding exactly let me say it differently. What's your understanding of what Ms. Nortier's role is?

28 (Pages 109 to 112)

	20 (14905	T	
	Page 109		Page 111
1	A. I don't know. I don't	1	a.m. We're back on the record. This is
2	again, I'm an Attorney Editor; she's a	2	DVD Number 2.
3	Publishing Specialist. I don't know what	3	Q. Ms. Redzic, we're looking at
4	her job is, specifics of her job and	4	Redzic Exhibit 6. And having reviewed it
5	responsibilities.	5	now, are you familiar with this document?
6	Q. Does Ms. Nortier is Ms.	6	A. No, I'm not.
7	Nortier responsible for making substantive	7	Q. But you are, as you said,
8	changes to the manuscript?	8	familiar with the concept of a
9	A. No.	9	publishability review?
10	Q. So only technical changes;	10	A. Yes.
11	putting the text in the proper format	11	Q. And that is something that you
12	MR. ZEISLER: Objection.	12	perform from time to time?
13	Q to get published?	13	MR. ZEISLER: Objection.
14	A. As far as I know.	14	A. From yes.
15	MR. CHARLSON: I'm going to ask	15	Q. Okay. Well, have you performed
16	the court reporter to mark as Redzic	16	them in the past?
17	Exhibit 6 a document titled	17	A. Publish yes, I have.
18	"Publishability Review," West-R 05980	18	Q. On how many occasions?
19	through West-R 6133.	19	A. I don't know specifically.
20	(The following exhibit was	20	Q. But you are therefore familiar
21	marked for identification: Redzic 6.)	21	with the general content of the
22	Q. Ms. Redzic, have you ever seen	22	publishability review?
23	this document before?	23	A. I'm familiar with the concept.
24	A. I I don't remember.	24	Q. Do you know whether the
	Page 110		Page 112
1	Q. Are you familiar with the	1	supplement the 2008-2009 supplement was
2	content of a publishability review at	2	subject to a publishability review?
3	West?	3	MR. ZEISLER: Objection.
4	A. Yes, I am.	4	Vague.
5	Q. Is a publishability review that	5	A. What do you mean by that?
6	you something that you perform?	6	Q. Well, I'm asking whether the
7	A. Yes.	7	process that is reflected in Redzic
8	Q. And have you ever referenced a	8	Exhibit 6, the Publishability Review, was
9	document like this as part of	9	conducted with respect to the 2008-2009
10	A. Well, this is a really big	10	supplement.
11	document. I can't really	11	MR. ZEISLER: Objection.
12	MR. ZEISLER: Take a few	12	A. It's still "publishability
13	minutes to look at it, please.	13	review"; you have to be more specific.
14	THE WITNESS: Okay.	14	Q. Well, I'm not sure that I can,
15	(Reviewing the document.)	15	Ms. Redzic, because having reviewed this
16	MR. CHARLSON: Let's go off the	16	document in its entirety, it appears to
17	record while Ms. Redzic takes a look at	17	me that there is a process performed by
18	this, since I think we're probably coming	18	West Attorney Editors reflected in this
19	up on the time.	19	document referred to as a "Publishability
20	THE VIDEOGRAPHER: It's 11:09	20	Review" that is performed on some or
21	a.m. We're going off the record.	21	perhaps all publish West publications.
22	(There was a pause in the	22	My question for you is: Was one
23	proceeding.)	23	performed for the 2008-2009 supplement?
24	THE VIDEOGRAPHER: It's 11:16	24	MR. ZEISLER: Objection.
	: : : : : : : : : : : : : : : : : : : :	_	J

32 (Page 125)

Page 125	
1 WITNESS CERTIFICATION	
2 .	
I hereby certify that I have read the foregoing transcript of my deposition testimony, and that my answers to the questions propounded, with the attached corrections or changes, if any, are true and correct.	
13	
DATE SARAH REZIC 15 . 16 .	
17 . 18 <u></u>	
19 PRINTED NAME	
20 . 21 .	
22 .	
23 . 24 .	