

EXHIBIT D

<p style="text-align: center;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p style="text-align: center;">-----</p> <p>DAVID RUDOVSKY and LEONARD SOSNOV, Plaintiffs, No. 09-CV-727</p> <p style="text-align: center;">v.</p> <p>WEST PUBLISHING CORPORATION, WEST SERVICES INC., AND THOMSON LEGAL AND REGULATORY INC., t/a THOMSON WEST, Defendants.</p> <p style="text-align: center;">-----</p> <p>Video-recorded Deposition Upon Oral Examination of: Sarah Redzic Location: Thomson West .50 Broad Street East Rochester, New York 14614 Date: March 3, 2010 Time: 9:09 a.m. Reported By: LYNN A. MULLEN, RPR</p>	<p style="text-align: center;">Page 3</p> <p>1 E X H I B I T S 2 Redzic 3 Exhibit Description 4 No. 1 2008-2009 Pocket Part, Bates 5 West-R 02225 through 02501 (PAGE-77) 6 . 7 No. 2 2007-2008 Pocket Part, Bates 8 West-R 01949 through 02223 (PAGE-80) 9 . 10 No. 3 Redline comparison of the 2007-2008 11 pocket part and the 2008-2009 pocket 12 part (PAGE-85) 13 . 14 No. 4 Time Data Report, 1/1/07 through 15 .12/31/09, Bates West-R 05866 through 16 .05869 (PAGE-92) 17 . 18 No. 5 Attorney Editor Activity 19 Elements -Direct Time, Bates West-R 05943 20 through 05944 (PAGE-92) 21 . 22 No. 6 Publishability Review, Bates 23 West-R 05980 through 06133 (PAGE-109) 24 .</p>
<p style="text-align: center;">Page 2</p> <p>1 A P P E A R A N C E S 2 Appearing on Behalf of Plaintiffs: 3 Noah H. Charlson, Esq. 4 Bazelon, Less & Feldman, P.C. 5 .1515 Market Street, Suite 700 6 Philadelphia, Pennsylvania 19102-1907 7 ncharlson@bazless.com 8 . 9 Appearing on Behalf of Defendants: 10 Aaron M. Zeisler, Esq. 11 Satterlee, Stephens, Burke & Burke, LLP 12 .230 Park Avenue 13 New York, New York 10169 14 azeisler@ssbb.com 15 . 16 Also Present: 17 John Wierzbicki 18 Appearing as Videographer: 19 David Parrotta 20 . 21 W I T N E S S 22 Name Page 23 Sarah Redzic 24 By Mr. Charlson 7</p>	<p style="text-align: center;">Page 4</p> <p>1 D O C U M E N T R E Q U E S T S 2 . 3 Any e-mail communication to Karen or Amy 4 advising them that the supplement was 5 complete 6 (By Mr. Charlson) (PAGE-64) 7 . 8 Identity of publications that Ms. Redzic 9 worked on prior to October 2008 that 10 involved criminal law 11 (By Mr. Charlson) (PAGE-69) 12 . 13 Editorial standard for how to phrase 14 instruction lines 15 (By Mr. Charlson) (PAGE-89) 16 . 17 . 18 . 19 . 20 . 21 . 22 . 23 . 24 .</p>

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

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

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

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<p>1 Q. Is it fair to say that Ms. 2 Earley had more of a role in your 3 training than Ms. Nadel did?</p>	<p>1 employed by Thomson Reuters?</p>
<p>4 A. Yes.</p>	<p>2 A. Yes.</p>
<p>5 Q. When you were hired, do you 6 know whether there were other Attorney 7 Editors hired at the same time, sort of 8 an incoming class of editors?</p>	<p>3 Q. Is -- in your understanding, is 4 West part of Thomson Reuters?</p>
<p>9 A. Not really.</p>	<p>5 A. As far as I understand, yes.</p>
<p>10 Q. So were there --</p>	<p>6 Q. Do you consider yourself to be 7 someone who works for West Publishing?</p>
<p>11 MR. ZEISLER: Were you finished 12 with your answer?</p>	<p>8 MR. ZEISLER: I'm going to 9 object to the extent you're in any way 10 seeking a legal conclusion about the 11 corporate entities or who she works for. 12 If you're asking for her understanding, 13 that's fine.</p>
<p>13 A. I don't know. I don't know.</p>	<p>14 A. As far as I understand, West is 15 a part of Thomson Reuters, so...</p>
<p>14 Q. Was there any sort of, you 15 know, presentation or seminar given to a 16 whole group of Attorney Editors that you 17 were part of?</p>	<p>16 Q. So if I refer to West and your 17 work for West --</p>
<p>18 MR. ZEISLER: Objection. At 19 the beginning when she first came or at 20 any time?</p>	<p>18 A. Yes.</p>
<p>21 Q. Well, let's break it out. At 22 the beginning.</p>	<p>19 Q. -- will that -- can we agree 20 on that?</p>
<p>23 A. At the beginning, all I 24 remember are individual sessions.</p>	<p>21 A. Yes.</p>
<p>24</p>	<p>22 MR. ZEISLER: We can agree on 23 that.</p>
<p>24</p>	<p>24 MR. CHARLSON: Okay. That's</p>
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<p>1 Q. Were there -- in the two-plus 2 years that you've been here at Thomson, 3 have there been training sessions or 4 presentations given to groups of Attorney 5 Editors?</p>	<p>1 all I'm getting at.</p>
<p>6 A. Yes.</p>	<p>2 Q. Are you aware of a term at 3 West among Attorney Editors of being 4 certified as an Attorney Editor?</p>
<p>7 Q. And can you describe those for 8 me?</p>	<p>5 A. I'm not sure.</p>
<p>9 A. I can't describe anything in 10 detail. They're just attorney continuing 11 education kind of guidelines that they 12 would just provide us with additional 13 training with.</p>	<p>6 Q. Do you know whether you are 7 considered a certified Attorney Editor?</p>
<p>14 Q. What sort of topics?</p>	<p>8 A. Again, I don't know what 9 "certified" means, so I can't tell you 10 whether...</p>
<p>15 A. I don't recall off the top of 16 my head a specific -- the specifics of 17 each of them, of each session.</p>	<p>11 Q. Are you required to record your 12 time spent performing tasks at West?</p>
<p>18 Q. Is there anything else you can 19 tell me about your training to become an 20 Attorney Editor at West?</p>	<p>13 A. Yes.</p>
<p>21 A. No.</p>	<p>14 Q. Do you have to record all of 15 your time spent?</p>
<p>22 Q. Are you aware of the term used 23 at Thomson Reuters or -- well, before I 24 ask that question, you said you're</p>	<p>16 A. At this point, yes.</p>
<p>24</p>	<p>17 Q. Was there a point at which that 18 was not the case?</p>
<p>24</p>	<p>19 A. Yes.</p>
<p>24</p>	<p>20 Q. When was that?</p>
<p>24</p>	<p>21 A. That was up to the 1st of this 22 year.</p>
<p>24</p>	<p>23 Q. Prior to January 1st, 2010, you 24 were not required to record your time?</p>

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1 Q. Approximately when was that conversation?	1 right?
2 A. It was toward the -- toward the	2 MR. ZEISLER: Mischaracterizes
3 end of 2008 sometime.	3 her testimony.
4 Q. And what was the substance of that conversation?	4 You can answer.
5 A. With -- well, with respect to what?	5 A. I'm not sure what you mean by
6 Q. With respect to the entire conversation.	6 "internal." There was a deadline, and
7 A. We -- we talked about the status of the book and what needed to be done for it.	7 that's all I knew about it, so...
8 Q. And what is your recollection about what the status of the book was at that time?	8 Q. Well, did somebody else --
9 A. I believe that I -- the book -- the book was overdue. It had a due date at -- for us to have a manuscript in-house and that we needed to -- we had a deadline to finish and that we needed to find a way to meet that deadline and produce -- and produce the title.	9 whose deadline was it, Ms. Redzic?
10 Q. Do you recall approximately how	10 A. Again, that's -- I'm not sure
11 far away the deadline was at the time that you had your meeting with Catherine Smith?	11 how the deadlines were set and who set them. I wasn't involved with making that decision. But we have a schedule, and per that schedule there was a deadline, so...
12 A. Not specifically.	12 Q. And was -- you said actually that at this conversation the manuscript was overdue; is that correct?
13 Q. Was it a month or less than a month?	13 A. Yes.
14 A. I -- I'm not -- again, I'm not sure specifically.	14 Q. So there had already been a deadline that had been missed for the supplement?
15 Q. Do you know who established that internal deadline?	15 A. I don't -- I don't believe -- I don't know. I don't believe so. I
16 MR. ZEISLER: Objection.	16 don't know what you mean.
17 A. I don't know.	17 Q. Well, I'm using your word, Ms. Redzic. You said the book was overdue, correct?
18 Q. Was that a deadline that was based on when publication -- well, when the supplement would need to be sent out to subscribers?	18 A. Yes.
19 A. What do you mean by that? Can you clarify?	19 Q. And that means that it had already been due and hadn't been turned in, right?
20 Q. Well, you said that your conversation with Ms. Smith involved a discussion of an impending internal deadline?	20 A. Yes.
21 MR. ZEISLER: Objection.	21 Q. Do you know how overdue it was at that point?
22 Q. For the manuscript; is that	22 A. I -- not specifically, no.
23	23 Q. But is it fair to say there was a sense of urgency to get the supplement prepared?
24	24 A. Yes.
25	25 Q. And so what did you and Ms. Smith discuss about what had to be done?
26	26 A. We discussed the possibility of finding -- finding a contractor to possibly initially do that, I believe, and I -- yes.
27	27 Q. When you say a "contractor," what do you mean?
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<p>1 A. I mean a person that we hire 2 who -- from the outside of the company to 3 complete the update. 4 Q. Would that typically -- well, 5 when you talked about finding a 6 contractor, were you considering finding a 7 practicing attorney who could do it or -- 8 is that the sort of thing you were 9 considering? 10 MR. ZEISLER: Objection. 11 You can answer. 12 A. Contractors are people who we 13 hired from outside of the company. Some 14 of them are practicing attorneys, some of 15 them are legal writers. Again, you know, 16 I don't -- specifically I don't recall. 17 Q. And you said you discussed the 18 possibility. Did you reach a decision 19 about whether or not to get a contractor 20 at that time? 21 A. I actually -- no, we actually 22 were unable to find anyone to do that, so 23 I believe that was -- that was the 24 discussion.</p>	<p>1 Q. And so out of West's entire 2 database of contractors, you were not able 3 to make contact with anybody about 4 preparing a supplement to the 2000 -- to 5 Pennsylvania Criminal Procedure for 6 2008-2009? 7 MR. ZEISLER: Objection. 8 A. Not -- I don't know about the 9 entire database. I wasn't able to make 10 -- to be in touch with people who I 11 called. 12 Q. Okay. Going back to that 13 conversation that you had with Catherine 14 Smith, you had said you talked about the 15 possibility of finding a contractor. Did 16 you discuss other options at that meeting? 17 A. Yes. 18 Q. What were the other options 19 that you discussed? 20 A. I said that I may have some 21 time to devote to the project. 22 Q. Any other options that were 23 discussed? 24 A. No.</p>
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<p>1 Q. So who was responsible for 2 trying to locate a contractor? 3 A. I was. 4 Q. Okay. But you were not able 5 to do so? 6 A. That's right. 7 Q. What steps did you take to try 8 to identify a contractor? 9 A. We have a database of 10 contractors, and I believe I pulled some 11 names from that database. 12 Q. And what did you do with those 13 names? 14 A. I tried to get in touch with 15 those people. 16 Q. And were you able to get in 17 touch with anybody? 18 A. No. 19 Q. Over how long a period of time 20 were you trying to get in touch with 21 these contractors? 22 A. I don't remember specifically. 23 A couple of weeks. Maybe less, maybe 24 more. I don't know.</p>	<p>1 Q. Just so I'm clear, Ms. Redzic, 2 at that meeting was it your understanding 3 that West was intending to publish a 4 supplement for 2008-2009 to the 5 Pennsylvania Criminal Procedure volume? 6 MR. ZEISLER: Objection. Vague 7 with respect to "at that time." 8 THE WITNESS: I'm sorry, could 9 you repeat that? 10 MR. ZEISLER: Objection. Vague 11 with respect to "at that time." 12 A. Can you be more specific with 13 your question? 14 Q. Well, the only reason it's 15 vague is because we don't know from you 16 when that meeting took place, but it is 17 that meeting with Catherine Smith that I'm 18 referring to. 19 MR. ZEISLER: That's fine, 20 Counselor. 21 MR. CHARLSON: Okay. 22 A. I mean, for whatever -- I guess 23 if you're referring to whenever we talked, 24 yes.</p>

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

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

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

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

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

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<p>1 specific books or other authors, author 2 issues. I mean, it covers -- it covers 3 anything it can cover, any issue it can 4 cover. 5 Q. And the document I'm handing 6 you, Redzic 5, has several Attorney Editor 7 activity elements. Are these the 8 descriptions of the directions to you for 9 how you're supposed to code time or what 10 the particular codes mean? 11 MR. ZEISLER: Objection. 12 A. Well, it's -- this is a 13 guideline as far as entering time, as far 14 as I recognize it. 15 Q. Well, Ms. Redzic, in August of 16 2008, you spent three hours devoted to 17 author relations. Was that your attempt 18 to contact contractors to do the update 19 for the 2008-2009 supplement? 20 A. I don't believe so. 21 Q. Well, did you have any contact 22 in August 2008 with Leonard Rudovsky -- 23 I'm sorry, with Leonard Sosnov or David 24 Rudovsky?</p>	<p>1 MR. CHARLSON: My understanding 2 is there's a Pennsylvania Practice series 3 of volumes that West publishes, of which 4 Pennsylvania Criminal Procedure is a 5 single volume, Volume 2. 6 MR. ZEISLER: Right. 7 Q. So my question is: Are you 8 responsible for other volumes in that 9 title of Pennsylvania Practice? 10 A. Other volumes in the series? 11 Q. Yes. 12 A. I believe so, yes. 13 Q. And are some of those other 14 volumes criminal law related? 15 A. I believe so, yes. 16 Q. Do you know which ones? 17 A. I think I told you already. I 18 don't know the specific titles. 19 Q. Did you look during the last 20 break to see if you could figure out 21 those titles? 22 A. No. 23 Q. Okay. So this -- this time 24 that you spent in August of 2008, that</p>
Page 98	Page 100
<p>1 A. No. 2 Q. Well, then, if it wasn't 3 contacting contractors and it wasn't 4 talking with Rudovsky and Sosnov, what was 5 it? 6 A. I believe it was -- I believe 7 that it was -- I was going over the 8 Pennsylvania Practice Series in general 9 and -- and I was looking at this book, 10 too, and we were trying to come up -- 11 and I was trying to come up with future 12 plans and -- for -- for this book and 13 Pennsylvania Practice Series in general. 14 Q. Are you responsible for all of 15 the Pennsylvania Practice Series? 16 A. I'm -- I'm not sure. 17 Q. Are you responsible for other 18 parts of the Pennsylvania Practice Series? 19 A. "Other parts" meaning? 20 MR. ZEISLER: I'm sorry, just 21 objection. Just for clarification, when 22 you say "series," you're talking more than 23 beyond this book; "series" plural, like 24 series --</p>	<p>1 was not related to actually preparing the 2 supplement or trying to find a contractor, 3 correct? 4 A. I believe so, correct. 5 Q. You believe I'm correct -- 6 A. Yes. 7 Q. -- that it was not? 8 A. That's correct. Well, can you 9 rephrase it so I can answer it with a 10 "yes" or "no"? 11 Q. For clarity's sake, I would be 12 happy to. 13 A. Okay. 14 Q. In August of 2008, the three 15 hours that you spent on author relations 16 with respect to Pennsylvania Criminal 17 Procedure was not time that was devoted 18 either to seeking a contractor for the 19 update or preparing the update yourself? 20 A. That's correct. 21 Q. Now, the next entries are for 22 "Pre- Production" on October 20th and 21st 23 of 2008, and it's a total of two and a 24 half hours. Do you know what those</p>

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<p>1 entries were for? 2 A. Not specifically. 3 Q. Would it be your practice, Ms. 4 Redzic, to code your time seeking 5 contractors as pre-production? 6 A. I -- again, I don't -- that 7 depends on the -- that depends on the 8 book. I -- that depends on the 9 situation. 10 Q. Okay. Well, in West Exhibit 5, 11 Activity Code 310 for "Pre-production" is 12 described as "Activities preceding receipt 13 of manuscript from author, including: 14 Selecting topics or planning content for 15 particular releases; requesting plant from 16 pub specialist to send to author; meetings 17 to discuss specifics of a particular 18 release; initial communication with 19 author/contractor regarding due dates; 20 following up with authors to insure timely 21 manuscript delivery; communicating with 22 author/contractor regarding content." 23 Reading that, does that refresh 24 your recollection as to whether you coded</p>	<p>1 record your time, correct? 2 MR. ZEISLER: Objection. Asked 3 and answered. 4 A. I guess so, yes. 5 Q. And you made an attempt to be 6 as accurate as possible in recording your 7 time, correct? 8 A. Within the guidelines that I 9 was provided by the company at the time, 10 yes. 11 Q. And did those guidelines provide 12 for you to accurately record your time 13 spent on particular projects? 14 MR. ZEISLER: Objection. 15 A. I believe that I already 16 answered that we were required to enter 17 up to 40 hours in our -- of our time. 18 Anything after that, we did not. We -- 19 we were not supposed to enter. So again, 20 within those guidelines, my time should be 21 correct. 22 Q. And in approximately October of 23 2008, were you spending more than 40 24 hours a week working on your projects as</p>
Page 102	Page 104
<p>1 your time spent seeking a contractor to 2 pre-production? 3 A. No. 4 Q. Time that you spent actually 5 working on the research of the supplement, 6 would that time have been spent -- coded 7 to pre-production? 8 A. I don't remember. 9 Q. Would that be your practice? 10 A. Again, it's case-specific. I 11 mean, these are vague. These guidelines 12 are guidelines, and they're very broad. 13 So, again, it's case-specific. 14 Q. Ms. Redzic, is -- I think we 15 established earlier that recording your 16 time is part of your job responsibilities 17 as an Attorney Editor at West, correct? 18 MR. ZEISLER: Objection. 19 Mischaracterizes previous testimony. 20 A. I don't -- I don't know that I 21 said that it's part of my job 22 responsibilities as Attorney Editor. It's 23 a responsibility. 24 Q. It was required of you to</p>	<p>1 an Attorney Editor? 2 A. From what I recall, I believe 3 so, yes. 4 Q. And did you -- did you record 5 that in -- those extra hours in any way? 6 MR. ZEISLER: Objection. Asked 7 and answered. 8 A. Again, they're recorded in here. 9 Anything above and beyond that is not 10 recorded. 11 Q. So sitting here today and 12 looking at West Exhibit 4 and West 13 Exhibit 5, you can't say what the two and 14 a half hours you spent on October 20th 15 and 21st were devoted to, correct? 16 A. Correct. 17 Q. Is it fair to say that you 18 would have -- that you were -- would have 19 been contacting contractors before you 20 started the actual work on the supplement? 21 A. I believe so, yes. 22 Q. Okay. Now, the next entries 23 are for October 29th and November 3rd, 24 2008, which you've coded a total of ten</p>

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

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

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1 WITNESS CERTIFICATION

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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.

DATE SARAH REZIC

PRINTED NAME