

EXHIBIT B

<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;</p>	<p>1 they represent, after which our court 2 reporter will swear in the witness and we 3 may proceed.</p>
<p>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;</p>	<p>4 MR. CHARLSON: Noah Charlson; 5 Bazelon, Less & Feldman, Philadelphia, for 6 the Plaintiffs.</p>
<p>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;</p>	<p>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.</p>
<p>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.</p>	<p>11 SARAH REDZIC, called herein as 12 a witness, first being sworn, testified as 13 follows:</p>
<p>23 AND IT IS FURTHER STIPULATED, 24 that the Notary Public, LYNN A. MULLEN,</p>	<p>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.</p>	<p>1 take them down.</p>
<p>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.</p>	<p>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?</p>
<p>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.</p>	<p>8 A. Okay. 9 Q. How are you currently employed? 10 A. I work at Thomson Reuters/West 11 Publishing.</p>
<p>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.</p>	<p>12 Q. And how long have you been 13 employed by Thomson Reuters? 14 A. Since October of 2007.</p>
<p>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>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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1 Q. Was Thomson Reuters your first 2 job out of law school?	1 recruiter --
3 A. Yes.	2 A. I responded to a posting.
4 Q. Have you -- during law school, 5 did you work as a lawyer at all?	3 Q. And who hired you?
6 A. Not as a lawyer. I wasn't 7 admitted.	4 A. Well, I had an interview with 5 several people, and I was -- the last 6 person I talked to was a recruiter. So 7 I don't know who was involved with the 8 decision. I can tell you who called me 9 and told me I was --
8 Q. Well, fair point. Did you work 9 in legal practice during law school?	10 Q. Who did you meet with while you 11 were interviewing?
10 A. I worked as a law clerk for a 11 law firm.	12 A. I remember meeting with 13 Catherine Smith, and there were several 14 other people. It was a group interview, 15 and I don't recall who else was in the 16 room.
12 Q. What was that law firm?	17 Q. And what -- what does an 18 Attorney Editor do at Thomson?
13 A. Brown & Kelly, LLP.	19 A. Well, it really depends on -- 20 depends on who you're working with and 21 what the job is or what -- you know, who 22 the author is. It's -- you're -- you're 23 an editor of -- for publications that 24 deal with legal topics. Now, that
14 Q. Is that in Rochester?	
15 A. It's in Buffalo, New York.	
16 Q. And what did you do there as a 17 law clerk?	
18 A. I researched and analyzed legal 19 issues.	
20 Q. And in law school, were you 21 involved in any law reviews?	
22 A. No.	
23 Q. Do you have any experience as a 24 lawyer working in criminal law?	
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1 A. No.	1 depends on who you're dealing with, what 2 the books are, who you're involved with, 3 what team you're working on, so I can't 4 really...
2 Q. Criminal procedure?	5 Q. When you were hired, did you 6 have an understanding that you were being 7 hired for a particular group within 8 Thomson -- within the Attorney Editors' 9 Group or to support a particular group?
3 A. No.	10 A. I believe there was a choice 11 between two groups, and I wasn't -- I 12 don't recall a discussion about how -- 13 which specific group I would go to at the 14 time.
4 Q. Are you currently a practicing 5 attorney?	15 Q. Which group did you go to?
6 A. No.	16 A. State Practice.
7 Q. You have no legal work outside 8 of --	17 Q. And what is the State Practice 18 Group?
9 A. No.	19 A. State Practice Group deals with 20 publications -- with publications -- with 21 State- specific publications.
10 Q. -- what you do for Thomson?	22 Q. And dealing with all 50 states, 23 or is it subdivided?
11 A. No.	24 A. Not all 50 states, as far as I
12 MR. ZEISLER: Let him finish 13 the question before you answer.	
14 THE WITNESS: Okay.	
15 Q. And what -- in what job were 16 you hired in October of 2007 at Thomson 17 Reuters?	
18 A. I was hired as an Attorney 19 Editor.	
20 Q. And how did you find that job?	
21 MR. ZEISLER: Objection. What 22 do you mean how did she find it?	
23 Q. Did you apply for the job?	
24 Did you respond to a posting? Did a	

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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>Page 22</p>	<p>22 MR. ZEISLER: We can agree on 23 that.</p>
<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>24 MR. CHARLSON: Okay. That's</p>
<p>6 A. Yes.</p>	<p>Page 24</p>
<p>7 Q. And can you describe those for 8 me?</p>	<p>1 all I'm getting at.</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>2 Q. Are you aware of a term at 3 West among Attorney Editors of being 4 certified as an Attorney Editor?</p>
<p>14 Q. What sort of topics?</p>	<p>5 A. I'm not sure.</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>6 Q. Do you know whether you are 7 considered a certified Attorney Editor?</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>8 A. Again, I don't know what 9 "certified" means, so I can't tell you 10 whether...</p>
<p>21 A. No.</p>	<p>11 Q. Are you required to record your 12 time spent performing tasks at West?</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>13 A. Yes.</p>
	<p>14 Q. Do you have to record all of 15 your time spent?</p>
	<p>16 A. At this point, yes.</p>
	<p>17 Q. Was there a point at which that 18 was not the case?</p>
	<p>19 A. Yes.</p>
	<p>20 Q. When was that?</p>
	<p>21 A. That was up to the 1st of this 22 year.</p>
	<p>23 Q. Prior to January 1st, 2010, you 24 were not required to record your time?</p>

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1 A. We were required to record our 2 time.	1 Q. And did you, in fact, record 2 your time during that period?
3 Q. But you were not required to 4 record all of your time?	3 A. I believe so.
5 A. That's right.	4 Q. What was the first -- well, at 5 some point did you go from shadowing 6 Karen Earley to being more independent?
6 Q. Could you please elaborate on 7 the distinction that you're drawing?	7 A. Yes. It was -- yes.
8 MR. ZEISLER: Objection. I 9 think it's clear the distinction she's 10 drawing. She said she's required to 11 record some of her time, not all of her 12 time prior to December -- January 2010.	8 Q. And was that a -- was that a 9 particular time, or was it a gradual 10 transition?
13 MR. CHARLSON: Actually, I 14 object to you putting words in the 15 witness's mouth, Aaron. She said -- she 16 did not use the words -- those are not 17 the words she used, but we'll have the 18 witness testify here today.	11 A. It was a gradual transition.
19 MR. ZEISLER: Okay. Well, 20 asked and answered.	12 Q. So am I correct, then, to 13 assume that you -- while you were still 14 shadowing Karen Earley, you also had some 15 projects that you were working on more 16 independently?
21 Q. Ms. Redzic, what changed as of 22 January 1st, 2010?	17 A. Yes.
23 A. After January 1st, we were 24 required to keep records of all of the	18 Q. What was the first project you 19 had that was independent?
	20 A. I don't recall.
	21 Q. Do you recall approximately when 22 that was?
	23 A. Not specifically, no.
	24 Q. Do you recall the first time
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1 time that we spent on the projects.	1 that you worked on a Pennsylvania project?
2 Q. And what was -- in your 3 understanding, how does that differ from 4 what the requirement was prior to 5 January 1st, 2010?	2 A. Not specifically.
6 MR. ZEISLER: Objection. 7 You can answer.	3 Q. Well, you're familiar now with 4 a title called Pennsylvania Criminal 5 Procedure by David Rudovsky and Leonard 6 Sosnov?
8 A. Before that we were required to 9 -- we were asked to put -- as far as -- 10 as far as I know, we were asked to put 11 -- record up to 40 hours that we worked.	7 A. Yes.
12 Q. Per week?	8 Q. And at some point you were 9 given the task of preparing a 2008-2009 10 supplement to that title?
13 A. Yes.	11 MR. ZEISLER: Objection. Lacks 12 foundation.
14 Q. And any time spent beyond that 15 was not required to be kept?	13 A. I wasn't tasked.
16 A. As far as I know, that's right.	14 Q. What do you mean you weren't 15 tasked?
17 Q. Was the 40 hours a minimum that 18 you were expected to record per week?	16 A. We had a conversation about -- 17 about the book.
19 MR. ZEISLER: Objection.	18 Q. Who's "we"?
20 A. I don't know.	19 A. I believe my Team Coordinator.
21 Q. Were you required to record 22 your time during the period that you were 23 shadowing Karen Earley?	20 Q. Was that Catherine Smith?
24 A. I believe so.	21 A. Yes.
	22 Q. Anybody else part of that 23 conversation?
	24 A. I don't believe so.

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

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

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1 understanding of your next steps when that meeting ended?	1 MR. ZEISLER: Objection.
2	2 You can answer.
3 A. I don't think that you	3 A. Yes, I believe so.
4 understand what -- the process that took	4 Q. And as part of your fulfillment
5 place. We had a conversation about	5 of your responsibility, did you undertake
6 contractors, but I don't know if it was	6 to try to locate a contractor for you to
7 at that -- it was before the meeting	7 oversee to do that job?
8 about -- about my work and my involvement	8 A. That was done -- again, that
9 with it. We discussed contractors and	9 was done prior to the meeting that I'm
10 what had been done during that time.	10 referring to, so I don't...
11 Q. During what time?	11 Q. Okay. At some point did you
12 A. In the weeks that we needed to	12 undertake to prepare the supplement
13 find -- to find a way to what we were	13 yourself?
14 going to do with the update.	14 A. Yes.
15 Q. So did you have more than one	15 Q. And approximately when was that?
16 conversation with Catherine Smith about	16 A. I don't recall the specifics.
17 the update?	17 It was towards the end of the year.
18 A. I believe so. I...	18 Q. At that point were you
19 Q. During the period that you were	19 shadowing Karen Earley?
20 trying to find a contractor?	20 A. No.
21 A. Yes.	21 Q. So this was going to be an
22 Q. Were you also doing other work	22 independent project for you?
23 on the supplement?	23 A. Yes.
24 A. What do you mean by "other	24 Q. At this point -- is it fair to
Page 42	Page 44
1 work"?	1 say this was sometime -- this was
2 MR. ZEISLER: Objection.	2 sometime in the fall of 2008?
3 Q. Were you doing any of the	3 A. I guess that's fair to say.
4 updating yourself?	4 Q. At that point in time had you
5 A. No.	5 prepared any State Practice treatise
6 Q. Okay. Let me see if we can	6 supplement on your own?
7 understand each other a little more	7 A. Can you be more specific about
8 clearly, Ms. Redzic. When you met with	8 what you mean by "prepared"?
9 Catherine Smith, did you come out of that	9 Q. Had you personally been
10 meeting with the understanding that it was	10 responsible for creating a manuscript for
11 your responsibility to make sure that a	11 a supplement to a treatise at that point
12 supplement to the 2000 -- to Pennsylvania	12 in time?
13 Criminal Procedure was prepared?	13 MR. ZEISLER: Objection.
14 MR. ZEISLER: Objection. Vague	14 A. Again, I'm not really sure
15 with respect to "that meeting."	15 specifically what you mean, but...
16 A. Which meeting are you referring	16 Q. I think my question is very
17 to?	17 clear.
18 Q. I'm referring to the meeting	18 A. Well, it's not very clear to
19 that you testified about.	19 me. I mean, what do you mean by
20 A. Okay. And what's the question?	20 "prepare"? "Prepare" is kind of --
21 Q. Was it your understanding that	21 "prepare," what does that mean?
22 it was your responsibility to see to it	22 Q. You don't know what "prepare"
23 that a supplement to Pennsylvania Criminal	23 means?
24 Procedure was prepared?	24 A. Well, it can mean many things.

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1 MR. ZEISLER: Objection.	1 may do other work per -- as requested per
2 A. I'm trying to find out what 3 you're trying to ask me. What does 4 "prepare" entail?	2 author. And you're also managing a 3 relationship with that author, and that 4 entails many things which is, again, 5 author-specific. So I -- I -- I can't 6 give you any more details than that.
5 Q. Well, let's talk about your job 6 a little generally, Ms. Redzic. As an 7 Attorney Editor, generally speaking you 8 are editing the work of an outside 9 Attorney Author; is that correct?	7 Q. Who are the authors that you're 8 referring to?
10 MR. ZEISLER: Objection.	9 A. The authors -- I'm referring to 10 the authors I work with who write for the 11 books that I'm responsible for.
11 A. It depends. I mean, I don't...	12 Q. And in your experience, are 13 those authors West employees, or are they 14 contractors?
12 Q. Is that part of your job?	15 A. They can be either.
13 A. Sometimes, yes.	16 Q. Okay. Do you also edit -- as 17 an Attorney Editor, do you also edit work 18 by outside authors?
14 Q. Okay. And are you sometimes 15 editing the work of somebody who's not an 16 outside Attorney Author?	19 A. Sometimes, yes.
17 A. What do you mean by -- well, 18 who is an outside Attorney Author? I 19 don't -- what do you mean by that?	20 Q. And just for a terminology 21 question, is an outside Attorney Author 22 the same as a contractor?
20 Q. Ms. Redzic, my understanding is 21 that Attorney Editors at West edit the 22 work of authors who are hired by West to 23 write the legal publications that West 24 publishes. Is that correct or not?	23 A. I -- I believe so.
	24 Q. Okay.
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1 MR. ZEISLER: Objection.	1 A. I don't -- I mean -- you said 2 "outside Attorney Author." Some authors 3 -- I don't know if every author is an 4 attorney, so...
2 A. I -- I don't know. I can't 3 speak for the rest of the company or what 4 other people are doing, but that's -- 5 sometimes that's true, so...	5 Q. Fair enough.
6 Q. Okay. Well, just so -- what 7 else does an Attorney Editor do? And I 8 understand we covered this at the 9 beginning, but there seems to be some 10 confusion, so I'd like to make sure that 11 the record is clear about what it is an 12 Attorney Editor does.	6 A. Okay.
13 MR. ZEISLER: Objection, because 14 I don't think the record is clear, and I 15 don't think you covered it in detail 16 earlier. But the record will speak for 17 itself. Ask a question.	7 Q. Just, for example, you're 8 familiar with Leonard Sosnov and David 9 Rudovsky, correct?
18 A. Again, an editor is -- has many 19 responsibilities. Again, that will depend 20 on -- on the book and the assignment. 21 It may include editing of other -- of 22 other work, and it, again, depends on who 23 you're working with and who your 24 relationship -- and the author is. You	10 A. Yes.
	11 Q. Are they considered West 12 contractors, or were they considered West 13 contractors when they were working on the 14 Criminal Procedure volume?
	15 A. I can't speak to -- I -- as 16 far as I know, they've been working with 17 the company for a long time, and I can't 18 speak to their relationship prior to, you 19 know, when I took this job. So I don't 20 know, but, you know...
	21 Q. But you knew they were not West 22 employees, right?
	23 A. Yes, I do know that.
	24 Q. So in your understanding of the

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<p>1 terminology, would they be considered 2 contractors or authors or something else? 3 A. As far as I know, they're 4 considered authors. 5 Q. So an author is different than 6 a contractor? 7 MR. ZEISLER: Objection. 8 A. Again, that's -- I -- I -- 9 that's something that I -- that depends 10 on the situation. That's -- they can be 11 either; they can be both. I don't know. 12 It's case-specific and person-specific, so 13 I don't -- those are individual 14 relationships that I'm not aware of and 15 arrangements that I'm not aware of, so... 16 Q. Okay. As an Attorney Editor, 17 are you -- is one of your jobs -- let me 18 rephrase it. 19 Are Attorney Editors sometimes 20 required to prepare a manuscript on their 21 own without the involvement of an outside 22 author or a contractor? 23 A. I -- 24 MR. ZEISLER: Objection.</p>	<p>1 clarify by what's "prepared." You know, 2 can you be more specific? 3 Q. Well, sure. And maybe by -- 4 maybe I'm using the wrong terminology, so 5 I'll need you to help me out with that. 6 What we're here talking about is the 2000 7 -- the December 2008 supplement to 8 Pennsylvania Criminal Procedure, correct? 9 A. Correct. 10 Q. And why don't we go at it this 11 way: What did you do with respect to 12 that supplement? 13 A. What -- what did I do with -- 14 what -- with what? 15 Q. What was your -- what was your 16 role in preparing that document for 17 publication? 18 A. Do you mean specific -- do you 19 mean specific tasks? Do you -- 20 Q. I mean everything. I mean: 21 What did you -- what did you, Sarah 22 Redzic, do to prepare the document that 23 was titled 2008 Supplement to Pennsylvania 24 Criminal Procedure for West Publishing?</p>
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<p>1 A. -- I can't speak to what other 2 Attorney Editors -- I can't speak to what 3 other Attorney Editors do. And, as I 4 said, every case is different, every book 5 is different, and I don't know each 6 responsibility of my coworkers, so I can't 7 really answer. 8 Q. Have you ever been responsible 9 for preparing a manuscript on your own? 10 A. Can you -- at what period of 11 time? 12 Q. Ever. During the entire period 13 of your employment at West. 14 A. At this point I don't believe 15 so. 16 Q. So certainly in October of 2008 17 you had never prepared any sort of 18 manuscript on your own, correct? 19 A. Complete -- do you mean -- 20 MR. ZEISLER: Yeah, objection. 21 Vague. 22 A. Do you mean complete? Did I 23 write it on my -- again, I think you 24 asked this before, and I just need you to</p>	<p>1 MR. ZEISLER: Objection to the 2 extent it calls for a narrative response. 3 A. I completed research. I 4 completed research for it and writing if 5 necessary. 6 Q. And was that something that you 7 had done with respect to any other 8 supplement at that point in time? 9 A. I may have. 10 Q. Well, in the two-plus years 11 that you've been working for West, have 12 you been involved with other annual 13 supplements to State treatises? 14 A. What do you mean by "involved"? 15 Q. I mean: Have you had a role 16 as an Attorney Editor in seeing to it 17 that that type of document got published? 18 A. Have I had a role in -- I'm 19 sorry, can you repeat that? 20 MR. CHARLSON: Could you read 21 the question back, please? 22 (The reporter read the requested 23 material.) 24 MR. ZEISLER: And sorry, "that</p>

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1 type of document" is a pocket part or a 2 treatise or what?	1 other research, other -- other research 2 treatises, other encyclopedias and other
3 Q. What we've been referring to as 4 a supplement.	3 links that can point you to research, and 4 I looked up some of those. And I also
5 A. Okay.	5 completed -- I also looked up all the
6 Q. Or pocket part. I think 7 they're colloquially known as pocket 8 parts.	6 Rules of Criminal Procedure, I believe. 7 Q. When you say you looked up all
9 A. Well, I'm an Attorney Editor 10 for several publications which have pocket 11 parts, so with that respect, yes, I've 12 been involved with the publishing process 13 of pocket parts.	8 the Rules of Criminal Procedure -- 9 A. Yes.
14 Q. And in all of those other 15 publications that you've been involved 16 with that have pocket parts, did somebody 17 -- did another author perform the initial 18 work of providing the information to go 19 into the supplement?	10 Q. -- what do you mean you looked 11 them up? 12 A. I mean I went through every
20 A. As far as I can remember, yes.	13 single rule in Criminal Procedure to check 14 for the validity of the rule.
21 Q. So, but that's not what 22 happened with respect to Pennsylvania 23 Criminal Procedure for December 2008, 24 right?	15 Q. Did you look for new rules that 16 had been added or amended? 17 A. As I said, I went through every
	18 single rule, so I looked for newer rules 19 as well.
	20 Q. And I take it that any changes 21 that you had -- that you found would have 22 been reflected -- you would have made 23 sure were reflected in the pocket part? 24 A. Well, it was -- again, it was
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1 A. That's correct.	1 a judgment call as far as what I was
2 Q. Okay. So, what did happen with 3 respect to that supplement?	2 going to include or not include, so I 3 decided what to -- I decided to include
4 A. I worked on the supplement.	4 what I thought would be relevant given 5 the time constraints.
5 Q. And so that brings us back to 6 my original question, which is: Had you 7 ever done that on your own?	6 Q. Well, do you recall whether 7 there were changes in rules, for example, 8 that you chose not to include?
8 A. On my own independently?	9 A. I don't remember specifically.
9 Q. At West before that time.	10 Q. Were there revisions that you 11 chose not to make because of time 12 constraints? 13 A. There may have been.
10 A. From what I understand what 11 you're asking me, then no.	14 Q. And that's because the 15 manuscript was overdue?
12 Q. And so what did you do to 13 prepare the update, the 2008 pocket part?	16 MR. ZEISLER: Objection.
14 A. I undertook the process of 15 research for an update, for that update.	17 A. I mean, I can't speculate. It 18 was over -- I mean, we had a deadline.
16 Q. And how did you do that?	19 We had a deadline, and we had to complete 20 a manuscript, so whether the due date of 21 that -- it's, I guess, relevant or not, I 22 guess.
17 A. I -- I believe that I -- we	23 Q. Did you -- did you read any 24 articles about changes in the law and
18 had the previous update provided by the 19 authors. It was the material that was 20 provided the year before, and I used that 21 material, and I -- I KeyCited those cases 22 that were in that material, and from 23 there -- from there I believe the KeyCite 24 can lead you to other -- other links,	

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<p>1 changes in criminal law in Pennsylvania in 2 connection with your work on the update? 3 A. I may have. I don't remember 4 specifically. 5 Q. Did you research whether any 6 criminal statutes had been changed, 7 amended or added? 8 A. As I said, I researched the 9 Rules of Criminal Procedure. 10 Q. Well, besides the rules, did 11 you look at any Pennsylvania Statutory 12 Law? 13 A. In -- I -- when I KeyCited the 14 cases, I don't know -- there may have 15 been links to other -- to other statutory 16 changes, but I don't recall specifically. 17 Q. Did you, for example, read 18 through the Legal Intelligencer, the daily 19 legal newspaper in Philadelphia about any 20 significant -- to see articles about any 21 significant developments in criminal 22 procedure during the prior year? 23 A. I don't recall. 24 Q. Did you look for any law review</p>	<p>1 of the specific time, but... 2 Q. Do you recall whether you 3 filled up an entire legal pad of notes? 4 A. I don't remember. 5 Q. Is it your normal practice to 6 discard your notes after the product goes 7 to Manufacturing? 8 A. That really depends on what I'm 9 doing. 10 Q. Are there cases in which you 11 keep your notes for a while? 12 A. There may be. 13 Q. Well, you've been at West for 14 over two years now. Are there products 15 that have gone to Manufacturing for which 16 you have kept your notes? 17 A. Not that I -- I can't really 18 recall specifically. 19 Q. If you went back to your files 20 right now, would you be able to find 21 notes for some publications that have 22 already gone to Manufacturing? 23 A. I -- again, I don't -- I don't 24 know specifically. I would have to go to</p>
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<p>1 articles about significant Pennsylvania 2 cases during the prior year? 3 A. Again, when you KeyCite the 4 cases and you go through the cases, law 5 review articles are sometimes linked. I 6 don't remember specifically what I looked 7 at or if I looked at any of those. 8 Q. What kind of records did you 9 keep of the work that you were doing to 10 prepare the 2008 supplement? 11 A. I was taking notes. 12 Q. Handwritten notes? 13 A. Yes. 14 Q. On like a legal pad, or do you 15 have some other -- 16 A. I believe it's -- it's usually 17 a legal pad, so I guess it's a legal 18 pad. 19 Q. Did you keep those notes? 20 A. No. 21 Q. When did you discard them? 22 A. Soon after -- I believe 23 sometime after the product was delivered 24 to Manufacturing for print. I'm not sure</p>	<p>1 my files and -- and check, but I don't 2 -- I don't know. 3 Q. So you can't say for sure that 4 you discard notes for every project? 5 A. Again, I don't know. 6 Q. During the process that you 7 were preparing the update, were you in 8 communication with Catherine Smith about 9 the update? 10 A. Well, what specifically about 11 the update? 12 Q. Anything. 13 A. I -- I maybe -- I may have 14 been. 15 Q. Well, how do you typically 16 communicate with Ms. Smith? 17 A. I would generally have a 18 conversation with her. 19 Q. Do you e-mail back and forth? 20 A. Sometimes, but... 21 Q. Do you know whether you had any 22 e-mail communication with Ms. Smith during 23 the period of time in which you were 24 working on the 2008 supplement -- the</p>

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<p>1 December 2008 supplement? 2 A. I don't remember. 3 Q. Have you ever searched your 4 e-mail to see? 5 A. Yes. 6 Q. And did you look at anything? 7 A. What do you mean did I look at 8 anything? 9 Q. Did you locate any e-mail 10 communication between yourself and Ms. 11 Smith during that period of time? 12 A. I don't remember specifically 13 that I located, but everything that I 14 located was handed over to counsel, so 15 whatever -- whatever I had, he has, or 16 I'm assuming you have, so... 17 Q. Did you submit any drafts of 18 the update to Ms. Smith? 19 A. No. 20 Q. Let me ask you this: In what 21 software system were you preparing the 22 update? 23 A. I believe it was Word. I 24 don't -- I mean, I don't know.</p>	<p>1 somebody or give them a call or something 2 like that. I don't remember specifically. 3 MR. ZEISLER: Are you finished 4 with your answer? 5 THE WITNESS: I'm done. 6 Q. Who's the person that you're 7 referring to? 8 A. I'm not really -- I'm not 9 really certain. It could be -- I think 10 maybe Karen. I forget -- I'm sorry, I 11 forget her last name. Karen or Amy. 12 She works on -- she works on a different 13 team. 14 Q. Is her carrel located close to 15 yours? 16 A. I don't believe so. 17 Q. Same floor? 18 A. No. 19 Q. Same building? 20 A. At this time, no. 21 Q. At that time? 22 A. No. Actually, at that time I 23 don't know either. No, she wasn't in the 24 same building.</p>
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<p>1 Q. Is that what you typically use 2 to prepare written work product? 3 A. Word, or sometimes PDF. It 4 depends on the product. 5 Q. And then when -- so when you 6 completed your draft, how did you -- who 7 did you give it to? 8 A. I handed it off to the person 9 who handles the computer coding. I was 10 done with it, so it was handed off to be 11 processed. 12 Q. And how did you hand it off? 13 A. I believe I saved it in -- I 14 believe I saved it in a folder. We have 15 shared -- we have folders that everyone 16 has access to, and I saved it in a 17 folder that's specific to -- to this 18 publication, and I let whoever was 19 supposed to be working on it, I let them 20 know that it's ready to be processed. 21 Q. And how did you let that person 22 know? 23 A. I -- I don't -- I don't 24 recall. I would usually just talk to</p>	<p>1 Q. So, how did you let this person 2 know that the work was complete? 3 A. I believe that I called her and 4 let her know. 5 Q. Is it possible that you sent 6 her an e-mail as well? 7 A. I don't remember. I don't -- 8 I don't believe so. 9 Q. During your search of your 10 e-mails, did you come across any e-mail 11 communication to this Karen or Amy 12 advising them that the -- that you had 13 completed the supplement? 14 A. I don't believe so, no. 15 Q. You don't believe that you 16 found it or -- 17 A. No. As far as I know, no. 18 MR. CHARLSON: I'll just 19 reiterate my request for -- if such an 20 e-mail does exist. 21 A. I -- again -- 22 MR. ZEISLER: He's talking to 23 me. 24 But I think, Noah, what is</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? 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?</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</p>
<p>4 A. Not specifically, no.</p>	<p>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.</p>
<p>5 MR. CHARLSON: Well, Aaron, I'd 6 certainly like the identity of those 7 publications that Ms. Redzic is referring 8 to.</p>	<p>8 Q. Do you know how many titles you 9 were responsible for at that period of 10 time, October 2008?</p>
<p>9 MR. ZEISLER: I'll take it 10 under advisement.</p>	<p>11 A. I believe between 60 or 70.</p>
<p>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.</p>	<p>12 Q. Is that the same number you're 13 responsible for now roughly?</p>
<p>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>14 A. Roughly, yes.</p>
	<p>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?</p>
	<p>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.</p>
	<p>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?</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?</p>
<p>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.</p>	<p>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...</p>
<p>9 Q. A few weeks working on it all 10 day every day or --</p>	<p>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?</p>
<p>11 A. I don't believe so, no.</p>	<p>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.</p>
<p>12 MR. ZEISLER: Let him finish 13 his question.</p>	<p>20 Q. Well, you said a couple times 21 now in your "Attorney Editor capacity."</p>
<p>14 Q. You don't believe so?</p>	<p>22 A. Yes.</p>
<p>15 A. All day every day for three 16 weeks? I don't -- I don't -- I don't 17 think so.</p>	<p>23 Q. Did you have some other 24 capacity at West that you were doing work</p>
<p>18 Q. Did you have other publications 19 that you were responsible for working on 20 at that period of time?</p>	
<p>21 A. In my capacity as an Attorney 22 Editor, yes.</p>	
<p>23 Q. What products were you working 24 on at that time?</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 on the book, it depends on the situation, 2 so I don't -- I don't know as far as -- 3 I don't have the guidelines in front of 4 me, so I can't -- I can't really answer 5 that.</p>	<p>1 generally speaking, what changes you made 2 to the supplement from the 2007-2008 3 version to the 2008-2009 version?</p>
<p>6 MR. CHARLSON: I'm going to ask 7 the court reporter to mark as Redzic 8 Exhibit 1 a document bearing Bates numbers 9 West-R 02225 through 02501.</p>	<p>4 MR. ZEISLER: Objection. Asked 5 and answered.</p>
<p>10 (The following exhibit was 11 marked for identification: Redzic 1.)</p>	<p>6 A. Again, not specifically. 7 Q. If you look at page -- just, 8 for example, page .02241.</p>
<p>12 Q. Ms. Redzic, I've handed you 13 what's been marked as Redzic Exhibit 1. 14 And I'll ask you to take a look at this 15 and tell me if you recognize it.</p>	<p>9 A. Okay. 10 Q. You see the words in italics 11 roughly in the middle of the page, "Add 12 the following at end of comment," 13 essentially directions to the reader?</p>
<p>16 A. (Reviewing the document.)</p>	<p>14 A. Yes. 15 Q. Is there a term that you use 16 at West for referring to what those 17 directions are?</p>
<p>17 MR. ZEISLER: I'd like to just 18 ask for the record: Has this document 19 been altered by you in any way, or is 20 this as produced?</p>	<p>18 A. I believe we call those 19 instruction lines. 20 Q. Instruction lines. Okay.</p>
<p>21 MR. CHARLSON: It's -- to the 22 best of my knowledge, it's as it was 23 produced by you.</p>	<p>21 In the course of updating the 22 supplement, did you rewrite a lot of 23 these instruction lines?</p>
<p>24 MR. ZEISLER: Okay.</p>	<p>24 MR. ZEISLER: Objection.</p>
Page 78	Page 80
<p>1 MR. CHARLSON: I do see some 2 highlighting on 2243.</p>	<p>1 A. I don't -- I don't remember.</p>
<p>3 MR. ZEISLER: I noted some 4 highlighting on 2259, for example, but 5 that's --</p>	<p>2 MR. CHARLSON: I'm going to ask 3 the court reporter to mark as Exhibit 2 4 -- Redzic 2 the 2007- 2008 pocket part 5 bearing Bates numbers West-R 01949 to 6 .02223.</p>
<p>6 MR. CHARLSON: I'm -- hmm. As 7 far as I know, this was printed out from 8 the PDF that you produced.</p>	<p>7 (The following exhibit was 8 marked for identification: Redzic 2.)</p>
<p>9 MR. ZEISLER: Okay. Thank you.</p>	<p>9 Q. You can hold on to both 10 documents.</p>
<p>10 Q. Do you recognize this, Ms. 11 Redzic?</p>	<p>11 First, let me ask you about 12 Redzic 2. Do you recognize that document 13 as the 2007-2008 pocket part to 14 Pennsylvania Criminal Procedure?</p>
<p>12 A. This looks like the -- a copy 13 of the 2008-2009 pocket part.</p>	<p>15 MR. ZEISLER: And just for the 16 record, it's obviously a long document. 17 She may need a minute to look through it.</p>
<p>14 Q. Did you prepare or ever create 15 or otherwise have access to a -- like a 16 comparison between this document and the 17 prior supplement, like a redline or a 18 comparison version?</p>	<p>18 A. The cover says that it's a 19 .2007-2008 pocket part, so I guess that's 20 what it is.</p>
<p>19 A. I didn't specifically redline 20 it, no.</p>	<p>21 Q. Well, did you have this -- did 22 you have the 2007-2008 pocket part while 23 you were working on the update?</p>
<p>21 Q. Is that something that you 22 sometimes do?</p>	<p>24 MR. ZEISLER: Objection. Asked</p>
<p>23 A. I don't believe so, no.</p>	
<p>24 Q. Do you know, Ms. Redzic,</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>

<p style="text-align: center;">Page 85</p> <p>1 .07-'08 to '08-'09 pocket part. 2 (The following exhibit was 3 marked for identification: Redzic 3.) 4 MR. ZEISLER: Are you, Mr. 5 Charlson, making any representation as to 6 the accuracy of this redline? 7 MR. CHARLSON: Well, I'm going 8 to -- thank you. For the record, 9 Redzic 3 is a document that my office 10 prepared at the very helpful suggestion of 11 Mr. Zeisler that the -- using -- using 12 the Adobe Acrobat compare function -- in 13 fact, the program used was Adobe Acrobat 14 Professional -- I could probably get you 15 the version number if you'd like -- using 16 the PDF versions of Redzic 1 and Redzic 2 17 that were produced by West, and we used 18 the Adobe compare function, and this is 19 the output that we got in setting it for, 20 I believe, a side-by-side comparison. I 21 can certainly let you know all the other 22 parameters that were used, upon request. 23 And this is the output document that was 24 created at your suggestion.</p>	<p style="text-align: center;">Page 87</p> <p>1 is what we got. This was the best we 2 could do, and so I just want -- I want 3 to note for the record -- well -- 4 MR. ZEISLER: My objection 5 still stands. 6 And my instruction is that you 7 can review the document and answer his 8 question, but you don't need to adopt the 9 accuracy of his purported redline. 10 Q. Ms. Redzic, have you prior to 11 today ever seen a redline comparison of 12 the 2007-2008 to 2008-2009 supplement? 13 A. As far as I can remember, no. 14 Q. I will represent to you that 15 the output of this document, Redzic 3, 16 shows numerous changes to the phrasing of 17 the instruction lines throughout the 18 supplement. 19 MR. ZEISLER: Is that a 20 question or a representation? 21 MR. CHARLSON: It's a 22 representation. 23 MR. ZEISLER: Okay. So what's 24 your question?</p>
<p style="text-align: center;">Page 86</p> <p>1 Q. So Ms. -- 2 MR. ZEISLER: For the -- for 3 the record, then, we object to the 4 document to the extent that it is your 5 representation as to what was actually 6 done, the parameters that were used, and 7 I'm just going to instruct the witness to 8 understand that this is a document 9 prepared by Plaintiffs' counsel and a 10 redline that Plaintiffs' counsel is 11 representing is accurate. 12 But you don't have to adopt his 13 representation. 14 MR. CHARLSON: Well, I just 15 want to clarify I'm not representing 16 anything other than this is how we -- 17 what software program we used. We 18 certainly didn't alter any of the 19 substance. This is what Acrobat put out 20 because the only way that we were 21 provided with these documents was in 22 Adobe. Had we been provided with them in 23 Word, we would have used -- done a Word 24 document comparison, but this is -- this</p>	<p style="text-align: center;">Page 88</p> <p>1 Q. Do you see that as you flip 2 through this redline? 3 MR. ZEISLER: Objection. Does 4 she see what? 5 A. Do I see what? 6 Q. Do you see that the redline 7 appears to show that numerous of the 8 instruction lines were changed? And does 9 that refresh your recollection at all, Ms. 10 Redzic, that in fact while you were 11 preparing the supplement, you reworded the 12 instruction lines? 13 A. It really does not. 14 Q. Is there a particular editorial 15 style that's required at West for how to 16 phrase instruction lines? 17 A. I believe there is, yes. 18 Q. And is it -- is the 2008 -- 19 does the 2008-2009 supplement reflect the 20 official West editorial instruction line 21 format? 22 A. I'd have to go through the 23 entire supplement. I -- I'd have to read 24 the entire thing to get the standard. I</p>

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1 can't just speculate as to accuracy.	1 MR. ZEISLER: Objection.
2 Q. Is there a published standard?	2 A. I -- I -- if it's three, it's
3 A. It's -- a standard is available	3 three. I don't -- I said I don't
4 in one -- for one of -- for a reference	4 remember specifically.
5 on an online application. I believe we	5 MR. ZEISLER: Noah, two
6 can search for it, yes.	6 comments at this point. One, I just need
7 Q. Is there a particular name of	7 a bathroom break at some point, so when
8 that document that you would look for?	8 you are at a convenient stopping point
9 A. Again, it's -- it's an internal	9 for you, I'd like to just take a quick
10 online Web site. I don't -- I don't	10 minute or two.
11 know the name -- specific name of the	11 And two, I just notice that
12 document. I --	12 it's 10:35, and there was another
13 MR. ZEISLER: Do you want to	13 deposition notice. And as I told you, as
14 go off the record for a second?	14 we previously discussed, I wasn't going to
15 MR. CHARLSON: No. I'm just	15 hold you to the minute, but I just wanted
16 going to ask for a production of that	16 to get an estimate of how potentially
17 editorial standard.	17 long you had with this witness just so I
18 MR. ZEISLER: I'll take it	18 can tell the other business people who
19 under advisement, but my understanding is	19 are waiting.
20 we've produced all such supplements and	20 MR. CHARLSON: Sure. Let's
21 editorial guidelines because it was part	21 take a quick break right now.
22 of Plaintiffs' request, and those were	22 THE VIDEOGRAPHER: It's 10:38
23 produced, whether online or in a print	23 a.m. We're going off the record.
24 version.	24 (There was a pause in the
Page 90	Page 92
1 Q. All right. Do you know, Ms.	1 proceeding.)
2 Redzic, specifically whether you, in	2 (The following exhibits were
3 preparing the 2008-2009 supplement, added	3 marked for identification: Redzic 4
4 any cases to the supplement?	4 and 5.)
5 A. I believe I added some cases.	5 THE VIDEOGRAPHER: It's 10:51
6 Q. And would -- if you added	6 a.m. We're back on the record.
7 cases, would they appear at the Table of	7 Q. Ms. Redzic, I've handed you
8 Cases at the -- in the back of the	8 Redzic 4, which bears Bates numbers
9 supplement?	9 West-R 05866 through 869, and Redzic 5,
10 MR. ZEISLER: Objection.	10 which is -- bears Bates numbers West-R
11 A. I -- I -- I don't put together	11 .05943 and 5944. Looking at Redzic 4, do
12 the Table of Cases, so I can't -- I	12 you recognize this?
13 can't tell you.	13 A. No.
14 Q. Who does that?	14 Q. If you look at the top of the
15 A. I -- I don't know specifically.	15 first page of the document, you see your
16 It's a publishing process. It involves	16 name in several of the first six rows or
17 numerous people, and I know my part of	17 so?
18 the job. I don't know who produces the	18 A. I believe so, yes.
19 table.	19 Q. And the second column is titled
20 Q. Do you know how many cases you	20 "Work Group"?
21 added to the 2008-2009 supplement?	21 A. Okay.
22 A. Not specifically.	22 Q. Do you see that? Do you know
23 Q. Would it surprise you if the	23 if WG01558 is your working group?
24 number was three?	24 A. I have no idea.

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<p>1 Q. Do you know what the "Network" 2 refers to? Does the number "56287" have 3 any meaning to you? 4 A. No. 5 Q. Okay. Do you see the 6 "Activity" column? 7 A. Yes. 8 Q. When you record your time, are 9 you required to enter an activity code? 10 MR. ZEISLER: Objection. 11 A. Generally, yes. 12 Q. Okay. And when you -- there's 13 also this form housing "Activity 14 Description." Do you, when you enter 15 your time, have to record a specific 16 description or just an activity code? 17 MR. ZEISLER: Objection. 18 A. I don't remember -- I don't 19 remember if it's a code or -- I don't 20 remember if it's a description or a code. 21 Q. Okay. Well, I'd like you to 22 turn to the second page West-R 05867. 23 And I want to direct your attention, 24 specifically towards the bottom of the</p>	<p>1 Pennsylvania Criminal Procedure in February 2 of 2008? 3 A. No, I don't, not specifics. 4 Q. I'm sorry. I missed that last 5 part. 6 MR. ZEISLER: Yeah, I couldn't 7 hear. 8 A. No. Specifically, no. Nothing 9 specifically, no. 10 Q. Do you have a recollection of a 11 meeting with Catherine Smith, Teri Kruk 12 and Karen Earley regarding this volume in 13 about February of 2008? 14 A. I remember meeting with them. 15 I don't remember the specific date. It 16 could have been February, but... 17 Q. Do you remember what the 18 substance of the meeting was? 19 A. Not specifically. 20 Q. It was about Pennsylvania 21 Criminal Procedure, though? 22 A. I believe so, yes. 23 Q. Was that the first time you 24 heard of Pennsylvania Criminal Procedure?</p>
Page 94	Page 96
<p>1 page, there's a series of rows with 2 entries from February 13, 2008 through 3 November 3rd, 2008. Do you see that? 4 A. I'm sorry, which rows? 5 Q. Near the bottom of the page, it 6 starts with "Redzic, Sarah." 7 A. Okay. Yes. 8 Q. The first entry is for 9 February 13, 2008, that I want you to 10 look at. Do you see that? 11 A. Yes. 12 Q. And you have -- there's an 13 entry there for two hours for a business 14 planning meeting? 15 A. Yes. 16 MR. ZEISLER: Objection. 17 A. Well... 18 Q. Do you have -- 19 A. I don't know if it's a meeting. 20 It says "Business Planning." I don't 21 know what -- what that entailed. 22 Q. My apologies. For business 23 planning. Do you have a recollection of 24 doing any work with respect to</p>	<p>1 A. I don't remember. 2 MR. ZEISLER: Objection. You 3 mean the treatise? 4 MR. CHARLSON: I mean the 5 particular title that we're talking about 6 here. 7 MR. ZEISLER: Okay. 8 A. I don't remember. 9 Q. I'm sorry if I just asked you 10 this. Do you recall the substance of 11 what was discussed at that meeting? 12 A. Not the specifics, no. 13 Q. The next two entries are for 14 two dates in August of 2008. 15 A. Sure. 16 Q. "Author Relations" is the code 17 for both of those. Do you see that? 18 A. Yes. 19 Q. What is "author relations" to 20 you? 21 A. Author relations can cover any 22 number -- any number -- any number of 23 issues that's either relating to this 24 author or other authors or authors of</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.</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.</p>
<p>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?</p>	<p>6 MR. ZEISLER: Right. 7 Q. So my question is: Are you 8 responsible for other volumes in that 9 title of Pennsylvania Practice?</p>
<p>11 MR. ZEISLER: Objection.</p>	<p>10 A. Other volumes in the series?</p>
<p>12 A. Well, it's -- this is a 13 guideline as far as entering time, as far 14 as I recognize it.</p>	<p>11 Q. Yes.</p>
<p>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?</p>	<p>12 A. I believe so, yes.</p>
<p>20 A. I don't believe so.</p>	<p>13 Q. And are some of those other 14 volumes criminal law related?</p>
<p>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>15 A. I believe so, yes.</p>
	<p>16 Q. Do you know which ones?</p>
	<p>17 A. I think I told you already. I 18 don't know the specific titles.</p>
	<p>19 Q. Did you look during the last 20 break to see if you could figure out 21 those titles?</p>
	<p>22 A. No.</p>
	<p>23 Q. Okay. So this -- this time 24 that you spent in August of 2008, that</p>
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<p>1 A. No.</p>	<p>1 was not related to actually preparing the 2 supplement or trying to find a contractor, 3 correct?</p>
<p>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?</p>	<p>4 A. I believe so, correct.</p>
<p>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.</p>	<p>5 Q. You believe I'm correct --</p>
<p>14 Q. Are you responsible for all of 15 the Pennsylvania Practice Series?</p>	<p>6 A. Yes.</p>
<p>16 A. I'm -- I'm not sure.</p>	<p>7 Q. -- that it was not?</p>
<p>17 Q. Are you responsible for other 18 parts of the Pennsylvania Practice Series?</p>	<p>8 A. That's correct. Well, can you 9 rephrase it so I can answer it with a 10 "yes" or "no"?</p>
<p>19 A. "Other parts" meaning?</p>	<p>11 Q. For clarity's sake, I would be 12 happy to.</p>
<p>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>13 A. Okay.</p>
	<p>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?</p>
	<p>20 A. That's correct.</p>
	<p>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>

<p style="text-align: center;">Page 105</p> <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 style="text-align: center;">Page 107</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>
<p style="text-align: center;">Page 106</p> <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 style="text-align: center;">Page 108</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? 14 A. As far as I know.</p>	<p>11 Q. And that is something that you 12 perform from time to time?</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>13 MR. ZEISLER: Objection.</p>
<p>20 (The following exhibit was 21 marked for identification: Redzic 6.)</p>	<p>14 A. From -- yes.</p>
<p>22 Q. Ms. Redzic, have you ever seen 23 this document before? 24 A. I -- I don't remember.</p>	<p>15 Q. Okay. Well, have you performed 16 them in the past?</p>
<p>Page 110</p>	<p>17 A. Publish -- yes, I have.</p>
<p>1 Q. Are you familiar with the 2 content of a publishability review at 3 West?</p>	<p>18 Q. On how many occasions?</p>
<p>4 A. Yes, I am.</p>	<p>19 A. I don't know specifically.</p>
<p>5 Q. Is a publishability review that 6 you -- something that you perform?</p>	<p>20 Q. But you are therefore familiar 21 with the general content of the 22 publishability review?</p>
<p>7 A. Yes.</p>	<p>23 A. I'm familiar with the concept.</p>
<p>8 Q. And have you ever referenced a 9 document like this as part of --</p>	<p>24 Q. Do you know whether the</p>
<p>10 A. Well, this is a really big 11 document. I can't really...</p>	<p>1 supplement -- the 2008-2009 supplement was 2 subject to a publishability review?</p>
<p>12 MR. ZEISLER: Take a few 13 minutes to look at it, please.</p>	<p>3 MR. ZEISLER: Objection. 4 Vague.</p>
<p>14 THE WITNESS: Okay. 15 (Reviewing the document.)</p>	<p>5 A. What do you mean by that?</p>
<p>16 MR. CHARLSON: Let's go off the 17 record while Ms. Redzic takes a look at 18 this, since I think we're probably coming 19 up on the time.</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>20 THE VIDEOGRAPHER: It's 11:09 21 a.m. We're going off the record.</p>	<p>11 MR. ZEISLER: Objection.</p>
<p>22 (There was a pause in the 23 proceeding.)</p>	<p>12 A. It's still -- "publishability 13 review"; you have to be more specific.</p>
<p>24 THE VIDEOGRAPHER: It's 11:16</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? 24 MR. ZEISLER: Objection.</p>

<p style="text-align: center;">Page 113</p> <p>1 A. Again, I still -- I can't 2 really answer that. 3 Q. Okay. If you look at the 4 third page of this document, Redzic 5 Exhibit 6, and there's a -- the third 6 page. 7 A. Okay. 8 Q. There's a bold bullet-pointed 9 question at the bottom, "What are West's 10 standards for publishability?" Do you see 11 that? 12 A. Yes. 13 Q. Without reference to this 14 document, are you generally familiar with 15 West's standards for publishability? 16 A. General standards, yes. 17 Q. Okay. And Exhibit 6 reads that 18 "For a submission to meet West Group's 19 quality standards and, therefore, to be 20 publishable, it must satisfy the following 21 objective criteria:" The first bullet 22 point is, "Does the submission provide 23 current and accurate coverage of 24 substantive and/or procedural law? This</p>	<p style="text-align: center;">Page 115</p> <p>1 customer could reasonably expect to find 2 covered?" 3 Was that one of your goals in 4 preparing the 2008-2009 supplement? 5 A. I believe so, yes. 6 Q. You do recall your testimony 7 earlier that you were not aware who the 8 anticipated readership of the treatise 9 was, right? 10 MR. ZEISLER: Objection. 11 A. Well, I don't remember 12 specifically what you asked or what I -- 13 what I said. Can you -- 14 Q. Were you aware of who the 15 intended customers were while you were 16 working on the 2008-2009 supplement? 17 A. I have an understanding, my 18 general understanding of the -- who the 19 customers are. But again, with the 20 specifics, I don't know who buys the 21 books, I don't know who uses them, so I 22 can't really give you the specific 23 details. 24 Q. If you -- if you look at the</p>
<p style="text-align: center;">Page 114</p> <p>1 means that the submitted information 2 discusses applicable law. West has an 3 obligation to its customers to provide 4 them with coverage that is as up-to-date 5 and accurate as possible with each 6 release." 7 Do you see that? 8 A. Yes. 9 Q. Do you agree that that is part 10 of West's publishability standard, in your 11 understanding? 12 A. Well, according to this 13 document, as far as general understanding, 14 yes. 15 Q. And was -- was providing 16 current and accurate coverage of the 17 law one of your goals in preparing the 18 .2008-2009 supplement? 19 A. I believe so, yes. 20 Q. The second bullet point is, "Is 21 the coverage complete from the perspective 22 of the publication and its intended 23 customers? In other words, does the 24 submission cover material that the</p>	<p style="text-align: center;">Page 116</p> <p>1 second paragraph of that second bullet, it 2 says, "You must make a judgment call with 3 respect to 'completeness' based on the 4 customer's expectations for the set for 5 which the materials are intended." 6 Did you consider the customer's 7 expectations in preparing the 2008-2009 8 supplement? 9 A. I may have. 10 Q. Who's currently responsible for 11 the Pennsylvania Criminal Procedure title 12 at West? 13 A. Well, define "responsible." 14 Q. What Attorney Editor is assigned 15 to that title? 16 A. To do what? 17 Q. Are different Attorney Editors 18 assigned to different -- to -- excuse me. 19 Let me rephrase. 20 Are multiple Attorney Editors 21 assigned to a single title? 22 A. I -- I don't know. 23 Q. Do you know who is -- at one 24 point you were assigned to the</p>

<p style="text-align: center;">Page 117</p> <p>1 Pennsylvania Criminal Procedure title, 2 correct? 3 MR. ZEISLER: Objection. I 4 think that you're -- you're confusing the 5 witness by being overbroad. Are you 6 talking about the treatise at issue in 7 this case, or are you talking about the 8 series? 9 Q. Well, "Criminal Procedure" is a 10 particular title in the Criminal Practice 11 Series. 12 A. Okay. 13 Q. I'm asking about the particular 14 title that we're talking about here at 15 this deposition. 16 A. Okay. 17 Q. Who's responsible for that 18 today? 19 A. As far as I know, it's still 20 me. 21 Q. Have you done any work since -- 22 in the past year, have you done any work 23 with respect to that title? 24 A. Define "work."</p>	<p style="text-align: center;">Page 119</p> <p>1 Q. But to the best of your 2 knowledge, you are the Attorney Editor 3 responsible for the title? 4 A. Yes. 5 MR. CHARLSON: Okay. Let's go 6 off the record. 7 THE VIDEOGRAPHER: It's 11:23 8 a.m. Going off the record. 9 (There was a pause in the 10 proceeding.) 11 THE VIDEOGRAPHER: It's 11:25 12 a.m. We're back on the record. 13 Q. Ms. Redzic, is there a minimum 14 unit of time that you are able to enter 15 into the West time recording program? 16 A. I don't know. 17 Q. What is the minimum unit that 18 you use? 19 A. What's a "minimum unit"? 20 Q. When we looked at Redzic 21 Exhibit 4, we saw entries measured in -- 22 for you measured in whole hours or .5, 23 half of an hour. And in looking at 24 Exhibit 4, I see a few entries in --</p>
<p style="text-align: center;">Page 118</p> <p>1 Q. Fair enough. Was a 2010 pocket 2 part created and -- was a 2010 pocket 3 part created? 4 A. 2010? 5 Q. Yes. 6 A. For this year? 7 Q. Yeah. 8 A. Not that I know of, no. 9 Q. Has the title -- has a decision 10 been made to terminate the title? 11 A. As far as I know -- I mean, I 12 don't know. 13 Q. Has there been discussion about 14 updating the title with the supplement? 15 A. I don't believe so. I don't 16 know. 17 Q. Has there been discussion about 18 having another author revise the title? 19 A. I don't believe so. 20 Q. What are the current plans that 21 West has with respect to Pennsylvania 22 Criminal Procedure? 23 MR. ZEISLER: Objection. 24 A. I have absolutely no idea.</p>	<p style="text-align: center;">Page 120</p> <p>1 measured in quarters of hours. So, I'm 2 asking you what the minimum element that 3 you use is. 4 A. I honestly don't remember what 5 the available options are. 6 Q. You continue to enter your time 7 today? 8 A. Yes. 9 Q. And what -- is it your practice 10 to enter your time contemporaneously, the 11 day that -- the same day? 12 A. Depends on the situation. 13 Sometimes I do; sometimes I don't. 14 Q. Do you recall what -- when you 15 recorded your time spent on the 2008-2009 16 supplement? 17 A. Absolutely not. 18 Q. Well, was it roughly 19 contemporaneous? Would it have been the 20 same month, for example? 21 A. Yes. 22 Q. Would it have been the same 23 week most likely? 24 A. Most -- yes.</p>

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1 Q. And you sometimes do it the same day?	1 Q. And what is your understanding of what a unit of data is?
2 A. Yes.	2 A. My understanding is that a unit is equal to about a page.
3 Q. Do you try to do it the same day?	3 A. My understanding is that a unit is equal to about a page. 4 Q. Okay. Were you given a guideline for how many pages of new material you were expected to provide for the 2008-2009 supplement?
4 A. Yes.	5 A. No.
5 Q. Have you been involved, Ms. Redzic, in the termination of a publication during your time at West?	6 Q. Was it ever even discussed? 7 A. No, not that I can remember.
6 MR. ZEISLER: Objection. Vague.	8 Q. After you submitted the April .2000 -- I'm sorry. After you submitted the December 2008 supplement to Karen Nortier, did you ever have a discussion about that supplement with Catherine Smith?
7 A. Can you be more specific?	9 A. I don't remember.
8 Q. Well, has any publication that you've been involved with been terminated, removed from publication subscription?	10 Q. Your last time entry for -- in 2008 as reflected on Redzic Exhibit 4 was for November 3rd, 2008. Did you see or have any involvement with the 2008-2009 pocket part for the remainder of 2008 after you submitted it to Ms. Nortier?
9 A. To date, no, as far as I can remember.	
10 Q. When you were working on the .2008-2009 supplement, were you given a minimum number of units to prepare for the supplement?	
11 MR. ZEISLER: Objection.	
12 A. I don't believe so. I don't remember.	
Page 122	Page 124
1 Q. Do you know what a unit is?	1 MR. ZEISLER: Objection.
2 A. Meaning a time unit?	2 A. Any involvement is -- I mean, what do you mean by that? I was the Attorney Editor, but as far as -- you have to define "any involvement."
3 Q. No, a character, a --	3 Q. Did you spend any time working on it?
4 A. Are you talking about as far as how many page numbers or words, or is that what you're referring to? Can you define "unit"?	4 A. Working on what?
5 Q. Sure. From reading through the documents that were produced by West, it was my understanding that 2500 characters equals one unit. Is that a -- is that a concept that you're familiar with?	5 Q. The supplement.
6 A. I believe so, yes.	6 A. I honestly don't remember. 7 Q. Your time sheet doesn't reflect it, correct?
7 Q. Okay. So 2500 characters is considered one unit at West?	8 MR. ZEISLER: Objection.
8 MR. ZEISLER: Objection.	9 A. Well, I don't know -- I don't know if this is -- this sheet doesn't reflect it, so -- or at least that I don't notice it, so I don't see it.
9 A. I -- I have to look at documents again. I don't -- I don't know off the top of my head as far as what's considered West -- what West considers. I can just...	10 MR. CHARLSON: I have no further questions. Thanks, Ms. Redzic.
10 Q. Are you familiar with the concept of a unit of data?	11 THE WITNESS: Thanks.
11 A. I believe so, yes.	12 MR. CHARLSON: All set.
	13 THE VIDEOGRAPHER: 11:31 a.m.
	14 The deposition is now completed.
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1 WITNESS CERTIFICATION

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