

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

ROGER CLEVELAND GOLF)	No. 2:09-cv-02119 MBS
COMPANY, INC.,)	
)	
Plaintiff,)	
)	
vs.)	
)	Deposition of
CHRISTOPHER PRINCE,)	
SHELDON SHELLEY, PRINCE)	MICHAEL A. JOHNSON
DISTRIBUTION, LLC, and)	
BRIGHT BUILDERS, INC.,)	
)	
Defendants.)	

* * *

October 11, 2010

9:17 a.m.

Avanti Videoconference Center
299 South Main, Suite 1300
Salt Lake City, Utah 84111

* * *

Letitia L. Meredith
-Registered Professional Reporter-
Certified Shorthand Reporter

A P P E A R A N C E S

For Plaintiff: John C. McElwaine
NELSON MULLINS RILEY
SCARBOROUGH
151 Meeting Street
Sixth Floor
Charleston, South Carolina 29401

For Defendant Bright Builders:

Paul Doolittle
JEKEL DOOLITTLE
P.O. Box 2579
Mount Pleasant, South Carolina 29464

* * *

I N D E X

EXAMINATION	PAGE
By Mr. McElwaine	3
By Mr. Doolittle	112
EXHIBITS	
No. 1 Getting Started Packet	37
No. 2 Brochure	66
No. 3 Coaching Document	68
No. 4 Account Notes	74
No. 5 Super Admin Account Pages	100
No. 6 Order Detail Documents	103
No. 7 Website Printout	106

1 Q. What I'm saying -- is there anybody at
2 Bright Builders -- who is the person at Bright
3 Builders most familiar with drop shippers as a method
4 of doing business for your clients?

5 A. I'm not sure what you're getting at. We
6 would tell these people about drop shippers they
7 could use to do research. So that's kind of the end
8 of it. We all knew who we were recommending for them
9 to go do research with, but that was the extent of
10 it. So we kind of all knew that.

11 Q. What kind of products are sold by drop
12 shippers?

13 A. There are drop shippers for everything.
14 You name it. And there are drop shippers for just
15 about everything. Doesn't mean you should do it.
16 That's for sure. That's why you need research.

17 Q. Are name brand products sold via drop
18 shippers?

19 A. There are a lot that claim that. I haven't
20 done drop shipping myself personally, so I would
21 assume that there are probably some that do it,
22 probably mark it up massively.

23 Q. Are you familiar with any name brand
24 products being sold via drop shipping?

25 A. Right now, no. I haven't been doing any of

1 that research at all myself, and I don't know.

2 Q. It's correct that you knew that the name of
3 the website or one of names of the websites being
4 used by Mr. Prince was copycatclubs.com; correct?

5 A. I'm sure I knew that at some point, yeah.

6 Q. What did you think he planned on selling
7 from that website?

8 A. Probably golf clubs. That's a pretty good
9 indication, don't you think?

10 Q. You knew that Mr. Prince was having
11 problems finding products with good profit margin,
12 did you not?

13 A. Everybody has problems finding products
14 with a good profit margin, so it was pretty standard
15 practice that he would probably have some troubles
16 along way as he did his research.

17 Q. And you knew that Prince was selling name
18 brand golf clubs; correct?

19 A. No, I did not know that for sure.

20 Q. What did you think he was selling then?

21 A. Golf clubs.

22 Q. Produced by people such as?

23 A. I don't know.

24 Q. Did you know that Mr. Prince was selling
25 golf clubs from TaylorMade, for instance?