

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

BETTY J. OSTERGREN,
Plaintiff,

v.

CIVIL ACTION NO. 3:08cv362

ROBERT F. MCDONNELL,
Defendant.

DEPOSITION SUMMARY

On February 19, 2009, at the office of Computing System Innovations, 791 Piedmont-Wekiwa Rd. Apopka Florida 32703, counsel took the de bene esse oral deposition of Henry Sal, Jr., by telephone by stipulation of the parties. Such deposition was taken before a Notary Public, recorded stenographically, completed and is to be presented into evidence.

Pursuant to this Court's Local Rule 30(G), Defendant herein attaches to the deposition and presents this witness testimony salient point summary.

At page 9, lines 17-21, the Florida de bene esse corporate president deponent makes clear that, after winning a Supreme Court of Virginia contract, his company redacted social security numbers from on-line land records in approximately one-half of Virginia's clerk's offices and that of the 49,047,283 total images that he processed, 1,575,422, or 3.21 percent, had social security numbers in them.

Page 10, lines 7-13, and page 11, line 8 through page 12, line 6, make clear that there is a database of each processed image and what was done to it by scanning software and then additionally by a human inspection manual review validation team.

Respectfully submitted,

ROBERT F. MCDONNELL,
Defendant herein

By: _____/s/_____

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of February, 2009, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

By: _____/s/_____

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