

EXHIBIT 3

Excerpt from Deposition of
Col. (Ret.) Mary Walker

1 Q What I'm going to do now is somewhat
2 laboriously go through a list of names of individuals
3 just to make sure that -- I know you've already told
4 me no, but I want to see if telling you a name jogs
5 any kind of recollection. So, I'm going to ask you if
6 you ever knew or suspected that any of these people
7 were gay or lesbian. Okay?

8 A Okay.

9 Q Tech Sergeant Stacey Julian?

10 A No.

11 Q Sergeant James Schaffer?

12 A No.

13 Q Major Faith Mueller?

14 A No.

15 Q Major Julia Scott?

16 A No.

17 Q Major Sue Schindler?

18 A No.

19 Q Major Sharon Carlson?

20 A No.

21 Q Master Sergeant Jill Brinks?

22 A No.

23 Q Major Annie Thomas?

24 A No.

25 Q Major Vince Oda?

1 A No.

2 Q Tech Sergeant Leah Crawford?

3 A No.

4 Q Major Kenneth Winslow?

5 A No.

6 Q Major Carolyn Newhouse?

7 A No.

8 Q Captain Ed --

9 A Hrivnak.

10 Q H-r-i-v-n-a-k?

11 A No.

12 Q Sergeant Aaron Maness?

13 A No.

14 Q Lieutenant Jill Brinks?

15 A No.

16 Q Lieutenant Colonel Bethany Ruals?

17 A No.

18 Q Colonel Bruce Daugherty?

19 A No.

20 Q Sergeant Candace Newberry?

21 A No.

22 Q Sergeant Theron Smith?

23 A Theron.

24 Q Theron?

25 A No.

1 Q Sergeant Charlene Livingston?

2 A No.

3 Q At some point while you were at McChord, was
4 there someone in the unit that was known by the
5 nickname Peaches?

6 MR. PHIPPS: Objection. Foundation.

7 THE WITNESS: Peaches was there probably
8 around 1980.

9 Q (By Mr. Lobsenz) What is Peaches' actual
10 name?

11 A I don't know.

12 Q What was her rank?

13 A I don't know that either.

14 Q What was her job?

15 MR. PHIPPS: Objection. Foundation.

16 THE WITNESS: She was a -- I want to say she
17 was a flight -- She was over the flight section. She
18 was an officer in charge of I want to say the training
19 section.

20 Q (By Mr. Lobsenz) Okay.

21 A Ground training is what it is.

22 Q No one ever told you that she either was or
23 they suspected she was lesbian?

24 A No.

25 Q And you never suspected that?

1 Q Let me read her comments from this OER from
2 Exhibit 13 into the record. "Exceptional flight nurse
3 sith superb clinical skills in the aeromedical
4 evacuation patient movement system; always ready to
5 volunteer and support the mission whether in-garrison
6 at home station or at deployed location; exhibited
7 remarkable leadership skills as chief of Stan Eval,
8 meticulously monitoring crew members, currency,
9 qualification and proficiency ensuring 100 percent of
10 squadron taskings met and outstandingly performed;
11 member is unable to participate since November 2004
12 due to pending administrative discharge."

13 Is there anything in those comments that of
14 your personal knowledge you can say I disagree with?

15 A No.

16 Q Okay. Have you ever held the opinion that
17 Major Witt's presence in the 446 has a negative impact
18 on unit cohesion or morale?

19 A No.

20 Q Have you ever held an opinion that if she
21 were reinstated to the unit that she would by being
22 reinstated have a negative impact on unit cohesion or
23 morale?

24 A Never thought about it.

25 Q I think that I'm done. My practice is now if