

1 Uh, do you think of any reason can you think of any reason that you would not be  
2 able to give your best testimony today?

3

4 No sir. I have to think about this.

5

6

7

8

9

10

11

12

13

14

15

16

17

18 [REDACTED] And start injecting client names and

19 defendant names that uh conveys on my ability to have a meaningful deposition  
with this witness.

And if you continue in that regard that will be another ground on which I'll seek to  
exclude this Witnesses testimony at trial please don't interrupt me perfectly  
entitled to ask questions during a discovery deposition not interrupt me suspend the  
deposition and we'll take it to the judge. I'm not going to have you interrupt my

1 question and I'd like to take a break, please. Let's go off the record. [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6

7

8

9

10

11

12

13

14

15

16

17

18

19