

The Honorable Robert S. Lasnik
The Honorable David G. Estudillo
The Honorable Lawrence Van Dyke

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

BENANCIO GARCIA III,

Plaintiff,

v.

STEVEN HOBBS, in his official capacity
as Secretary of State of Washington, et al.,

Defendants.

Case No.: 3:22-cv-5152-RSL-DGE-LJCV

**PLAINTIFF’S NOTICE OF ERRATA
CORRECTIONS FOR DEPOSITION OF
BENANCIO GARCIA III**

Plaintiff Benancio Garcia III files this Notice to alert the Court to the errata corrections for his deposition recently served upon the parties. Excerpts from the transcript of Mr. Garcia’s unsigned deposition, taken on February 3, 2023, were previously filed with the Court. (*See* Dkt. # 30-2.) Subject to the changes and corrections contained in the errata sheet (*see* Ex. A), on March 6, 2023, Mr. Garcia attested to the accuracy of the transcript of that deposition.

1 DATED this 6th day of March, 2023.

2 Respectfully submitted,

3 s/ Andrew R. Stokesbary

4 Andrew R. Stokesbary, WSBA No. 46097
5 CHALMERS, ADAMS, BACKER & KAUFMAN, LLC
6 701 Fifth Avenue, Suite 4200
7 Seattle, WA 98104
8 T: (206) 207-3920
9 dstokesbary@chalmersadams.com

10 Jason B. Torchinsky (pro hac vice pending)
11 Phillip M Gordon (pro hac vice pending)
12 HOLTZMAN VOGEL BARAN
13 TORCHINSKY & JOSEFIAK PLLC
14 15405 John Marshall Hwy
15 Haymarket, VA 20169
16 T: (540) 341-8808
17 jtorchinsky@holtzmanvogel.com
18 pgordon@holtzmanvogel.com

19 Dallin B. Holt (pro hac vice pending)
20 HOLTZMAN VOGEL BARAN
21 TORCHINSKY & JOSEFIAK PLLC
22 Esplanade Tower IV
23 2575 East Camelback Rd
24 Suite 860
25 Phoenix, AZ 85016
26 T: (540) 341-8808
27 dholt@holtzmanvogel.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court of the United States District Court for the Western District of Washington through the Court's CM/ECF System, which will serve a copy of this document upon all counsel of record.

DATED this 6th day of March, 2023.

Respectfully submitted,

s/ Andrew R. Stokesbary
Andrew R. Stokesbary, WSBA No. 46097

Counsel for Plaintiff

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Exhibit A



ERRATA


CASE NAME: Garcia III v. Hobbs, et ano. / Palmer v. Hobbs, et al.

DATE TAKEN: 2/3/2023

WITNESS: Benancio Garcia III

CORRECTIONS

| Page | Line | Now Reads | Should Read | Reason(s) for Change(s) |
|-------|-------|--------------------------------|-------------|-------------------------|
| _____ | _____ | <u><i>See Attachment A</i></u> | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |

DocuSigned by:

 DE2C1E8043AF480...

Signature of Deponent



DECLARATION

CASE NAME: Garcia III v. Hobbs, et ano. / Palmer v. Hobbs, et al.

DATE TAKEN: 2/3/2023

WITNESS: Benancio Garcia III

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.

DocuSigned by:

DE2C7E8043AF480...
Benancio Garcia III

Signed on the 6th day of March, 202³.

Attachment A

Deposition Errata Sheet

| <u>Page:Line</u> | <u>Now Reads</u> | <u>Should Read</u> | <u>Reason(s) for Change(s)</u> |
|------------------|--|--|--|
| 9:17 | I didn't prepare for this deposition. | I met with my attorneys for a few hours. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 10:5 | Yes. The attorney that's right here that I'm using the office for because we were both confused. | Yes. The attorney that's right here that I'm using the office for because we were both confused. I also spoke with Dallin Holt, another one of my attorneys. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 20:4 | I saw a copy, yes, I did, of my Complaint, but not of the one that we're doing the deposition on. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 20:15 | That's -- that's why I'm confused, when I'm talking my Complaint, I know what my Complaint is, but I have not seen anyone else's Complaint. I'm sorry. | That's -- that's why I'm confused, when I'm talking my Complaint, I know what my Complaint is, but I have also seen the Complaint in the Palmer litigation. I'm sorry. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my |

| | | | |
|-------|---|--|--|
| | | | misstatements for the record. |
| 45:17 | No. | Yes. A basic understanding. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 46:2 | I'm aware in the sense that I was served the paperwork, but I -- I didn't look into -- I mean, I -- all I looked at basically is where I had to be, and the time of the deposition was going to be. I didn't look into anything more than that. | Yes. I have seen some pleadings in the Palmer litigation and am aware that they intervened. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 46:10 | That's correct. | No. I became aware of the Palmer litigation in the Spring of last year. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 47:12 | No. | Yes. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 47:16 | No. I brought this lawsuit on the fact that -- that I believe that there was racial gerrymandering occurring, | Yes. While I brought this lawsuit on the fact that -- that I believe that there was racial gerrymandering occurring, and | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had |

| | | | |
|-------|---|--|--|
| | and that I would see this all the way through. | that I would see this all the way through. I was okay if the racial gerrymandering claim continued in the Palmer litigation. | misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 47:22 | As important as it was for me to run for U.S. Congress because I believe I will do what is the best interests of 4th District. It's as important to me that when I signed on to this lawsuit, that I would see to the end what would occur. There's no wavering on my completion of this. | As important as it was for me to run for U.S. Congress because I believe I will do what is the best interests of 4th District. It's as important to me that when I signed on to this lawsuit, that I would see to the end what would occur. However, it is more important to me that we win the claim, and if that happened in the Palmer litigation, I am okay with that. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 50:13 | I will never agree to not be part -- I agreed that I would finish this all the way through to -- | I agreed that if the claim proceeded in the Palmer litigation than I was still seeing this through. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 50:17 | Yes. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 59:23 | Yes. That's also news to me. | No. I knew my attorneys also represented the Palmer Intervenor Defendants since the Spring of last year. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my |

| | | | |
|-------|--|--|--|
| | | | misstatements for the record. |
| 60:4 | I wasn't aware until it was brought up to me today that if the case were to move forward, that the intervening defendants -- or intervening Jose, Alex, and Mr. Campos would be the ones moving forward on the case and I would be withdrawn from the case. Is that correct? | Yes. I was aware what the Palmer Intervenor Defendants were asking the Court to do, and that that the intervening defendants -- or intervening Jose, Alex, and Mr. Campos would be the ones moving forward on the case and I would be withdrawn from the case. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 60:13 | I got to be honest. I made it clear that, if I started this, I was going to finish to the end, and I am not pleased. | While my preference is to finish this litigation, in the end, I am okay so long as we eventually prevail with my claim in whatever case. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 60:18 | Absolutely correct. | My preference is to finish this litigation, but if it is better that it be finished in the Plamer case then I am okay with that. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 61:12 | Yes. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 61:14 | Yes, I do. | No, I don't. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had |

| | | | |
|-------|--|---|--|
| | | | misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 61:16 | There are conflicting reasons why the Complaint was filed on initially why I filed it and to know that, if this case were to be moved forward, the intervening witnesses, or defendants, however you want to -- plaintiffs, would go ahead and see the Complaint in a different light, opposite to what was initially filed, and that I would not see this to fruition, to completion of adjudication. | As I said, I don't see a problem with it. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 62:2 | Uh-huh | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 62:6 | That's correct. | No. That is not correct. I do not believe that the Palmer Intervenors interests' are opposite mine. As I understand it we both want race-neutral districts. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 62:10 | That is correct, and our legal representation agreement. | That is correct, and our legal representation agreement. And I believe they are representing my point of view. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my |

| | | | |
|--------|--|--|--|
| | | | misstatements for the record. |
| 67:3 | Yes. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 96:17 | No. | No. I don't believe there are any conflicts that I need to waive. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 98:7 | Yeah. | No. I had several phone calls with Drew in the spring and summer of last year. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 104:7 | Prior to that, I believe there was a letter -- I believe there was an email sent, but -- | Prior to that, I believe there were multiple emails sent. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 104:10 | Maybe six months ago, maybe five months, six months. | Drew emails me or calls me with updates. He called and emailed me several times in the spring and summer. When there | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had |

| | | | |
|--------|-----|---|--|
| | | is an update on the case that I should know, he sends me an update. | misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 104:14 | No. | I can't remember exactly, but Drew has kept me informed. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 106:2 | No. | I was told before, but I know it has changed a few times. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 106:4 | No. | I was told when trial was—a few different times. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |

Exhibit A



ERRATA

CASE NAME: Garcia III v. Hobbs, et ano. / Palmer v. Hobbs, et al.

DATE TAKEN: 2/3/2023

WITNESS: Benancio Garcia III

CORRECTIONS

| Page | Line | Now Reads | Should Read | Reason(s) for Change(s) |
|-------|-------|--------------------------------|-------------|-------------------------|
| _____ | _____ | <u><i>See Attachment A</i></u> | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ | _____ |

DocuSigned by:

 DE2C1E8043AF480...

Signature of Deponent



DECLARATION

CASE NAME: Garcia III v. Hobbs, et ano. / Palmer v. Hobbs, et al.

DATE TAKEN: 2/3/2023

WITNESS: Benancio Garcia III

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page hereof.

DocuSigned by:

DE2C7E8043AF480...
Benancio Garcia III

Signed on the 6th day of March, 202³.

Attachment A

Deposition Errata Sheet

| <u>Page:Line</u> | <u>Now Reads</u> | <u>Should Read</u> | <u>Reason(s) for Change(s)</u> |
|------------------|--|--|--|
| 9:17 | I didn't prepare for this deposition. | I met with my attorneys for a few hours. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 10:5 | Yes. The attorney that's right here that I'm using the office for because we were both confused. | Yes. The attorney that's right here that I'm using the office for because we were both confused. I also spoke with Dallin Holt, another one of my attorneys. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 20:4 | I saw a copy, yes, I did, of my Complaint, but not of the one that we're doing the deposition on. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 20:15 | That's -- that's why I'm confused, when I'm talking my Complaint, I know what my Complaint is, but I have not seen anyone else's Complaint. I'm sorry. | That's -- that's why I'm confused, when I'm talking my Complaint, I know what my Complaint is, but I have also seen the Complaint in the Palmer litigation. I'm sorry. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my |

| | | | |
|-------|---|--|--|
| | | | misstatements for the record. |
| 45:17 | No. | Yes. A basic understanding. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 46:2 | I'm aware in the sense that I was served the paperwork, but I -- I didn't look into -- I mean, I -- all I looked at basically is where I had to be, and the time of the deposition was going to be. I didn't look into anything more than that. | Yes. I have seen some pleadings in the Palmer litigation and am aware that they intervened. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 46:10 | That's correct. | No. I became aware of the Palmer litigation in the Spring of last year. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 47:12 | No. | Yes. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 47:16 | No. I brought this lawsuit on the fact that -- that I believe that there was racial gerrymandering occurring, | Yes. While I brought this lawsuit on the fact that -- that I believe that there was racial gerrymandering occurring, and | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had |

| | | | |
|-------|---|--|--|
| | and that I would see this all the way through. | that I would see this all the way through. I was okay if the racial gerrymandering claim continued in the Palmer litigation. | misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 47:22 | As important as it was for me to run for U.S. Congress because I believe I will do what is the best interests of 4th District. It's as important to me that when I signed on to this lawsuit, that I would see to the end what would occur. There's no wavering on my completion of this. | As important as it was for me to run for U.S. Congress because I believe I will do what is the best interests of 4th District. It's as important to me that when I signed on to this lawsuit, that I would see to the end what would occur. However, it is more important to me that we win the claim, and if that happened in the Palmer litigation, I am okay with that. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 50:13 | I will never agree to not be part -- I agreed that I would finish this all the way through to -- | I agreed that if the claim proceeded in the Palmer litigation than I was still seeing this through. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 50:17 | Yes. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 59:23 | Yes. That's also news to me. | No. I knew my attorneys also represented the Palmer Intervenor Defendants since the Spring of last year. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my |

| | | | |
|-------|--|--|--|
| | | | misstatements for the record. |
| 60:4 | I wasn't aware until it was brought up to me today that if the case were to move forward, that the intervening defendants -- or intervening Jose, Alex, and Mr. Campos would be the ones moving forward on the case and I would be withdrawn from the case. Is that correct? | Yes. I was aware what the Palmer Intervenor Defendants were asking the Court to do, and that that the intervening defendants -- or intervening Jose, Alex, and Mr. Campos would be the ones moving forward on the case and I would be withdrawn from the case. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 60:13 | I got to be honest. I made it clear that, if I started this, I was going to finish to the end, and I am not pleased. | While my preference is to finish this litigation, in the end, I am okay so long as we eventually prevail with my claim in whatever case. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 60:18 | Absolutely correct. | My preference is to finish this litigation, but if it is better that it be finished in the Plamer case then I am okay with that. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 61:12 | Yes. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 61:14 | Yes, I do. | No, I don't. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had |

| | | | |
|-------|--|---|--|
| | | | misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 61:16 | There are conflicting reasons why the Complaint was filed on initially why I filed it and to know that, if this case were to be moved forward, the intervening witnesses, or defendants, however you want to -- plaintiffs, would go ahead and see the Complaint in a different light, opposite to what was initially filed, and that I would not see this to fruition, to completion of adjudication. | As I said, I don't see a problem with it. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 62:2 | Uh-huh | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 62:6 | That's correct. | No. That is not correct. I do not believe that the Palmer Intervenors interests' are opposite mine. As I understand it we both want race-neutral districts. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 62:10 | That is correct, and our legal representation agreement. | That is correct, and our legal representation agreement. And I believe they are representing my point of view. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my |

| | | | |
|--------|--|--|--|
| | | | misstatements for the record. |
| 67:3 | Yes. | No. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 96:17 | No. | No. I don't believe there are any conflicts that I need to waive. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 98:7 | Yeah. | No. I had several phone calls with Drew in the spring and summer of last year. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 104:7 | Prior to that, I believe there was a letter -- I believe there was an email sent, but -- | Prior to that, I believe there were multiple emails sent. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 104:10 | Maybe six months ago, maybe five months, six months. | Drew emails me or calls me with updates. He called and emailed me several times in the spring and summer. When there | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had |

| | | | |
|--------|-----|---|--|
| | | is an update on the case that I should know, he sends me an update. | misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 104:14 | No. | I can't remember exactly, but Drew has kept me informed. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 106:2 | No. | I was told before, but I know it has changed a few times. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |
| 106:4 | No. | I was told when trial was—a few different times. | Following my deposition, I reviewed the transcript and my communications with counsel. I realized I had misremembered many things, and now that my memory has been refreshed, I wanted to correct my misstatements for the record. |