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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

NADIA NAFFE,

Plaintiff,

CASE NO:
8:04-cv-01916-JDW-TGW

vs.

REPUBLICAN PARTY OF FLORIDA,
et al.,

Defendant.

/

VOLUME 3 (pp. 312 - 394)

CONTINUED
VIDEOTAPED
DEPOSITION OF: NADIA NAFFE

TAKEN BY: Counsel for Defendant Republican
Party of Florida

DATE: September 26, 2005

TIME: 9:58 a.m.

PLACE: Ford & Harrison LLP
101 East Kennedy Boulevard
Suite 900
Tampa, Florida

REPORTED BY: Natalie W. Breaux, RPR, CRR
Notary Public
State of Florida at Large

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- and -

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ALSO PRESENT:

Mel Byrd, Videographer

I N D E X

P A G E

Examination by Mr. McKenna 318

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NO.	EXHIBITS DESCRIPTION	PAGE
23	11/19/03 e-mail	322
24	11/19/03 fax	331
25	10/8/03 proposal to Allison DeFoor	343
26	3/10/04 e-mail to Sechen from Sheppard	372
27	3/10/04 e-mail to Sechen from Sheppard	374
28	1/19/04 e-mail from Terry Kester	381

1 The continued videotaped deposition, upon
2 oral examination, of NADIA NAFFE, taken on the 26th
3 day of September, 2005, taken by Counsel for
4 Defendant Republican Party of Florida, at the
5 offices of Ford & Harrison LLP, 101 East Kennedy
6 Boulevard, Suite 900, Tampa, Florida, beginning at
7 9:58 a.m., reported by Natalie W. Breaux, Registered
8 Professional Reporter, Certified Realtime Reporter,
9 and Notary Public in and for the State of Florida at
10 Large.

11 * * * * *

12 MR. THOMPSON: We are in about -- we've
13 done about eight hours' worth of depositions.
14 It's over the seven-hour allotment. In order,
15 you know, to try to avoid any kind of
16 potential discovery dispute, you know, I am
17 consenting to a little bit more time for
18 Mr. McKenna.

19 I wrote him last week -- or the week
20 before last asking how much more time he was
21 going to be taking, and I did not get a
22 response. What I want to avoid is consenting
23 to more time in order to avoid a discovery
24 dispute and then still have a discovery
25 dispute later on. I'd like to know how much

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1 more time you think you need.

2 MR. McKENNA: Well, I can tell you what
3 topics I still want to cover, and I intend to
4 cover the complaints that she made and her
5 allegations of harassment retaliation. Now,
6 how long that's going to take, given where
7 we've been, I don't know. There still may be
8 discovery disputes, though, Jim. There still
9 may be disputes about whether she's answered
10 questions, about whether I've gotten all the
11 documents that I'm entitled to, you know. And
12 we've got correspondence going back and forth
13 on the fact. So I'm not going to agree that
14 there aren't going to be any discovery
15 disputes.

16 MR. THOMPSON: All right. I'm just
17 going to let you know in advance. At some
18 point I'm going to say, "Enough is enough."
19 And if you want to go to the judge, you can
20 certainly go to the judge and ask for more
21 time, but I'm not going to let this thing just
22 be a never-ending, ongoing deposition -- it's
23 already in its third day -- where it just
24 continues in perpetuity and then not be able
25 to take depositions of defendant's witnesses

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1 because defense counsel isn't consenting to
2 dates because he hasn't completed Ms. Naffe's.

3 MR. McKENNA: I've already given you
4 dates for the other depositions you've asked
5 for.

6 MR. THOMPSON: No. No. No. And we're
7 trying to work on those. What I'm talking
8 about is I couldn't even start getting
9 depositions until Ms. Naffe's was over. So
10 it's just a short amount of time.

11 MR. McKENNA: I don't understand that
12 one. You've gotten dates before her
13 deposition was over for the people you've
14 asked for.

15 MR. THOMPSON: I understand. We have
16 dates that you've given. I don't think that
17 most of those dates are working on my
18 calendar.

19 MR. McKENNA: Okay. Well, I don't
20 know. You haven't responded.

21 MR. THOMPSON: I believe that my
22 secretary, Grace, has responded to your
23 secretary or someone.

24 MR. McKENNA: Not that I'm aware of. I
25 haven't heard anything on the dates.

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1 THE VIDEOGRAPHER: Are you ready to
2 proceed with the videotape?

3 MR. THOMPSON: Yes.

4 THE VIDEOGRAPHER: Going on videotape.
5 Standby. Five seconds. This is the beginning
6 of No. 1. We are on the videotape record at
7 10:04 a.m., September 26th of 2005. This is
8 the continuation of the deposition of
9 Ms. Naffe.

10 EXAMINATION

11 BY MR. McKENNA:

12 Q Ma'am, you understand you're still under
13 oath?

14 A Yes, sir.

15 Q Do you need to go over the rules again
16 for depositions?

17 A I don't think so.

18 Q Is there any reason why you're not going
19 to be able to answer the questions I ask you today
20 accurately, completely and truthfully?

21 A What do you mean by that?

22 Q Is there any reason why you would not be
23 able to answer the questions I ask you today
24 completely?

25 A Well, after our last deposition, the very

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1 next day I had an appointment with my psychiatrist,
2 Dr. Pinard, and she said it is possible that I may
3 not be able to give accurate answers because of my
4 medicine; and because I was so distraught after that
5 deposition, she's changed my medicine, and I'm on a
6 lot heavier medicines now.

7 So, you know, again, I'm not a doctor,
8 but my doctor did say that it is possible that I
9 can't give accurate answers. And just thinking back
10 to the deposition, I remember you asking me the
11 names of my roommates. And I couldn't concentrate
12 during the deposition. I had severe headaches.
13 If you recall, I asked you and your staff to give me
14 some aspirin. Between the hours of ten and four, I
15 took six aspirin for my headaches. And I couldn't
16 even remember the names of my roommates, and I see
17 them every single day. I only got one out of three
18 of their names correct.

19 So to answer your question, that was -- I
20 told Dr. Pinard what you had asked me, and she said
21 that basically you should not have asked me that,
22 because I'm not a doctor and I can't give a medical
23 opinion, and you know that.

24 MR. McKENNA: What do you want to do,
25 Jim?

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1 MR. THOMPSON: I think the answer is
2 going to stand. I don't know -- as long as
3 she's required to be on this medication --
4 it's her doctor's opinion that the medication
5 may affect how she testifies. I don't know
6 how to proceed under that. She can't go off
7 the medication.

8 MR. McKENNA: Why not?

9 MR. THOMPSON: She survives with that
10 medication. She was almost --

11 BY MR. McKENNA:

12 Q What medication are you on?

13 A I'm taking a hundred milligrams of
14 Lamaticol, 25 milligrams of Seroquel, and I'm
15 still taking 20 milligrams of Prozac.

16 MR. McKENNA: Well, I don't see how I
17 can do a deposition if she's not going to be
18 able to answer the questions accurately,
19 completely and truthfully. So I don't know
20 what we do at this point.

21 THE WITNESS: We can depose your
22 witnesses.

23 MR. THOMPSON: Well, it's your call. I
24 don't know what to say except she actually
25 took this question to her doctor because she

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1 didn't know -- as you recall, last deposition,
2 she said she didn't know the answer because
3 she's not a doctor. She asked her doctor, and
4 her doctor basically said -- and you can take
5 her doctor's deposition. I don't know -- I've
6 never had this particular issue happen. I
7 don't know how to deal with it.

8 MR. McKENNA: Okay. Why don't we go off
9 the record for a minute.

10 (Recess from 10:07 to 11:25 a.m.)

11 BY MR. McKENNA:

12 Q We've had an extended off-the-record
13 discussion as to the witness' competency to testify
14 here today. As a result of that, I'm going to ask
15 you again, ma'am: Is there any reason that you
16 cannot answer the questions I'm going to ask you
17 today completely, accurately and truthfully?

18 A I believe I can right now, but there are
19 times where it is difficult for me to answer your
20 questions, not because I don't want to. I just -- I
21 can't concentrate or I can't focus. I have
22 difficult headaches, and that happened during our
23 last deposition. But as I sit here right now, other
24 than the headache that I have, I feel fine.

25 Q And if you get to the point to where you

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1 believe you cannot answer the questions I'm going to
2 ask you completely, accurately and truthfully, you
3 will so notify us?

4 A I will let my attorney know.

5 Q When last we spoke, we were discussing
6 the complaint you made on November to Terry Kester
7 in your amended complaint. Do you recall that,
8 ma'am?

9 A I vaguely recall that.

10 Q And I believe you testified that you had
11 sent an e-mail to Mr. Kester complaining about race-
12 matched job assignments. Is that correct?

13 A I don't remember if those were my exact
14 words, but, suffice it to say, I did send an e-mail
15 to Terry that evening, because I was concerned and
16 -- and cc'd the chairman on the issue with the
17 assignments.

18 Q Are you finished?

19 A Yes.

20 (Exhibit 22 marked for identification.)

21 Q Ma'am, I'm going to hand you what we've
22 marked for purposes of identification as Defendant's
23 Exhibit 22 and ask you if you recognize that
24 document.

25 A Yes, I recognize the document.

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1 Q And is the top page of Defendant's
2 Exhibit 22 the e-mail to which you just referenced?

3 A I am not a hundred percent sure on that,
4 because I wrote him an original e-mail. It wasn't
5 something that I -- it wasn't a trailing -- I don't
6 remember it being a trailing e-mail like this.

7 Q Are you finished with your answer?

8 A No, sir. I'll let you know when I'm
9 finished. You know what? This could not -- I don't
10 think that this is the e-mail. The e-mail that --
11 I'm not certain that this is the e-mail, because I'm
12 thinking -- because I remember going home, typing an
13 e-mail, and he responded to the e-mail, and it said
14 to call the office, and I don't see anything in here
15 about calling the office.

16 There's a lot of other things in here but
17 not about calling the office, so this might have
18 been one of the e-mails where we went back and forth
19 and talked about this event, but -- but I don't see
20 his response. It looks like -- okay. There is
21 one. There is two. There is one, and there is
22 two. There's three.

23 I don't see his response saying, "Nadia,
24 call the office at 11 a.m." So I'm thinking that
25 this is maybe one of the other e-mails that -- where

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1 we talked about it.

2 Q What did you say in the e-mail to
3 Mr. Kester?

4 A I don't remember off the top of my head,
5 sir, but if you showed me the e-mail, I could read
6 it to you.

7 MR. McKENNA: Move to strike as
8 nonresponsive to the answer -- to the
9 question.

10 BY MR. McKENNA:

11 Q What did you say in the e-mail to
12 Mr. Kester?

13 A I said something to the effect of,
14 "Terry, I don't understand why I was given this
15 project. This is sort of Suzann's territory." And
16 just the e-mail basically explained my confusion
17 about getting the -- having to do this the way --
18 just having to do this whole thing.

19 It didn't make any sense to me, and I saw
20 no reason why I needed -- why I would be getting
21 this assignment and why not Suzann, because that's
22 her main job to coordinate the chairman's schedule
23 and the events that she attends. And those aren't
24 all the things that I said. That's what I remember
25 right now, and that's just sort of a summary of the

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1 theme of the e-mail.

2 Q Do you recall, as we sit here today,
3 anything else that you said in that e-mail?

4 A I'm sure there were other things that I
5 said in the e-mail. If I saw the e-mail, it would
6 help my recollection a lot.

7 MR. McKENNA: Move to strike as
8 nonresponsive to the answer.

9 BY MR. McKENNA:

10 Q Do you recall --

11 A I am responding.

12 Q -- as we -- as we sit here today, do you
13 specifically recall anything else that was in the
14 e-mail?

15 A Can you maybe ask that question in a
16 different way, sir?

17 Q As we sit here at this table today, do
18 you have any specific recollection of anything else
19 that you said in the e-mail to Mr. Kester?

20 A Other than my previous answer, I can't
21 think of anything else as I sit here right now.

22 Q Do you have a copy of that e-mail?

23 A No, sir, I do not have a copy of the
24 e-mail. Your client has a copy of the e-mail.

25 Q Now, turning back to Defendant's 22, the

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1 original message at the bottom is from Suzann
2 Guimond to you, copied to Terry Kester. Is that
3 correct?

4 A Yes.

5 Q And it's dated Wednesday, November 19,
6 2003, 4:07 p.m. Correct?

7 A Yes, sir.

8 Q And it's sent with high importance. Is
9 that correct?

10 A Yes, sir.

11 Q And the text of the message says,
12 "Nadia:

13 In follow up to our earlier
14 conversation." Do you see that, ma'am?

15 A Yes.

16 Q Was there an earlier conversation between
17 you and Ms. Guimond, if I'm pronouncing that
18 correctly?

19 A I don't remember having an earlier
20 conversation with her. I'm not saying that we
21 didn't have a conversation, but I don't remember.

22 Q So Ms. Guimond may have had a
23 conversation with you regarding the logistics,
24 location, times, et cetera, for the Saturday evening
25 event. Is that correct?

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1 A Again --

2 MR. THOMPSON: I'm going to object to
3 form.

4 A Again, we may have had a conversation
5 about it, but I can't imagine that we could have
6 discussed too much, because, as I told you the last
7 time we talked about this event, I had to get the
8 invitation from someone, and I didn't get the
9 invitation until, I believe, the 19th, and I -- when
10 I got it, I faxed it to the office. And then it
11 looks like Ms. Rice e-mailed it to me on the 19th as
12 well. And Suzann's e-mail is dated November 19th at
13 4:07, and the e-mail that I received from Ms. Rice
14 is dated the same day, November 19th, at 5:23.

15 So when I got the e-mail, I forwarded it
16 to everybody in addition to faxing the invitation
17 that Ms. Rice sent to -- to everyone.

18 Q Do you know whether Suzann Guimond knew
19 who the members of the Saramana Club were?

20 A Yes, I'm sure that she knew who they
21 were.

22 Q How do you know that?

23 A Because Mr. -- they've had other round-
24 tables -- prior to my being hired, they had other
25 round-tables at the headquarters, and she said she

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1 knew Johnny Hunter, and I know she knew Frances.

2 She had their contact information,
3 because she booked the vice chairman. Originally
4 the vice chairman was supposed to be the one going
5 to this event. The event was on the calendar for a
6 long time.

7 He was scheduled to go to this event, and
8 then at the last minute the chairman was going to
9 the event. So she -- I mean, she had -- Terry said
10 she did have some information, because she booked
11 the vice chairman for it.

12 Q Do you know whether other field directors
13 were also required to get similar information for
14 the chairman?

15 A Define "similar information."

16 Q Information about the -- something like
17 the Saturday night event that is referenced in
18 Defendant's Exhibit 22.

19 A Saturday night event? What Saturday
20 night event are you talking about?

21 Q The one that's referenced in Defendant's
22 Exhibit 22.

23 A The -- are you referring to the Saramana
24 event itself?

25 Q The --

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1 A It wasn't a Saturday -- you're shaking
2 your head, Eddie. It wasn't a Saturday night
3 event. It was a lunch event. This was a luncheon
4 event. So that's why I'm like, "What Saturday night
5 event are you talking about?"

6 Q So that's why you were confused?

7 A Well, you asked me for a Saturday night
8 event, and that's why I was reading, trying to find
9 out what Saturday night event were you reading about
10 in this document. I don't see anything about
11 Saturday night event.

12 Q Well, if you look on the bottom of
13 page -- of Defendant's Exhibit 22.

14 A The bottom.

15 Q The bottom. It says, "In follow up to
16 our earlier conversation, I need the logistics (i.e.
17 location, times, et cetera) for the Saturday night
18 event ASAP."

19 A It doesn't say "night" anywhere. It says
20 "Saturday event."

21 Q All right. The Saturday event. Were you
22 ever asked to get similar --

23 THE WITNESS: Now he's starting to
24 confuse me.

25 MR. ISLER: I think -- I'm going to

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1 interject. I think this was very simple
2 that -- that -- obviously Ed thought it was a
3 nighttime event. It may have been a daytime
4 event, but I think that the context of the
5 question was very clear.

6 We're talking about a particular event,
7 and the question that was posed and is still
8 pending was: Are you aware whether other
9 field directors have been asked to get similar
10 information about similar-type events --
11 right? -- meaning events of local groups like
12 this. You asked what the term "similar"
13 meant.

14 Had other field directors, to the best
15 of your knowledge, been asked to get
16 information about similar events for the
17 chairman? That's the question that's pending.

18 A I would have to say no, not that I'm
19 aware of. I'm aware of county events like the
20 county executive committees, Lincoln Day Dinners and
21 things like that, but not for clubs.

22 Q Were you ever asked to get similar
23 information for other events for the chairman?

24 A Can you repeat the question, please?

25 MR. McKENNA: Read it back.

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1 (The Reporter read as requested.)

2 A I had not been asked to do that prior to
3 this instance. But after this instance Terry told
4 me that this kind of thing was my job, and so after
5 that point I did.

6 Q And you copied Defendant's Exhibit 22 to
7 a CR Carter, which is Carol Carter. Is that
8 correct?

9 A Correct.

10 Q And you were informed that that was
11 inappropriate, were you not?

12 A Terry didn't say that it was
13 inappropriate. He asked me why I did it, and I
14 looked up the e-mail, and in fact I had did it, and
15 that was a mistake.

16 (Exhibit 23 marked for identification.)

17 Q And the fact is you simply thought it was
18 beneath you to have to get an invitation for the
19 chairman, didn't you?

20 A No.

21 MR. THOMPSON: Object to the form.

22 A Not at all.

23 Q So you didn't have any problem with the
24 assignment. Is that correct?

25 A I did have a problem with the assignment.

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1 Q Let me hand you what we've marked for
2 purposes as Defendant's Exhibit 23 and ask you if
3 you recognize that document.

4 A Yes, I do.

5 Q And is that the facsimile copy of the
6 transmittal cover sheet where you sent the
7 invitation to the Republican Party?

8 A Yes, sir.

9 Q Now, you testified that you had a
10 conversation with Mr. Kester the next day on the
11 telephone where you complained about the
12 assignment. Is that correct?

13 A Yes, sir.

14 Q I'm going to hand you what we've already
15 marked for purposes of identification as Defendant's
16 Exhibit 3 and ask you to please look at the entry on
17 the first page for --

18 A Mr. McKenna, before you ask your
19 question, I need to take a break.

20 MR. ISLER: Okay. Let's go off the
21 record.

22 (Recess from 11:45 to 11:56 a.m.)

23 MR. McKENNA: We just had a stipulation
24 off the record. We're going to remark the
25 first exhibit that we used today, which is the

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1 Wednesday, November 19, 2003 series of
2 e-mails, as Exhibit 23, and the fax, which is
3 Bates numbered 000202, as Exhibit 24. Is that
4 correct, Counsel?

5 MR. THOMPSON: Yes.

6 BY MR. McKENNA:

7 Q Now, going back for a minute, ma'am, to
8 23, which is now marked as 23, that is the same
9 event that we discussed last time, isn't it, that
10 you contend you complained about?

11 A That is the event.

12 Q Okay. Now, you indicated that on the
13 next day you had a telephone conference with
14 Mr. Kester where you also complained about that
15 event. Is that right?

16 A I complained about the event, and Terry
17 told me to call the office the next day.

18 Q That would have been November 20, 2003.
19 Correct?

20 A Yes.

21 Q And on Exhibit 3 that you have in front
22 of you, we have an entry for November 20, 2003. Do
23 you see that, ma'am?

24 A Yes.

25 Q And is that a true and accurate

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1 representation of the conversation that you had with
2 Mr. Kester on that date?

3 A It's an excerpt of the conversation.

4 Q What else was in the conversation?

5 A As I told you before, Mr. McKenna, this
6 document is excerpts from notes I wrote to counsel,
7 and it doesn't include every single thing that
8 happened on that day.

9 Q Well, tell me every single thing that
10 occurred in that conversation with Mr. Kester.

11 A I don't remember every single word that
12 was said in that conversation.

13 Q Tell me what you do remember.

14 A The theme of the conversation was this:
15 He told me to call the office. I called the office,
16 and he was outraged that I questioned why I had the
17 assignment. And I didn't really understand why he
18 was so outraged, but he was. And he was even more
19 upset that the matter had been discussed and --
20 while the chairman was in the car with me and that I
21 had cc'd her on the e-mail. And he wanted to know
22 why I cc'd her, and I told him because she -- I told
23 Kester because she told me to. And he asked about
24 Carol Carter as well, and I explained to him, you
25 know, that she was in the car, too, the chairman

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1 included her in the conversation, and that it was a
2 mistake to cc her on the e-mail.

3 And I -- I went on to explain to him --
4 since he was so upset why I had sent the e-mail -- I
5 was confused about the assignment. I didn't
6 understand why I had to do it and wasn't this more
7 of Suzann's responsibility.

8 And basically his response was: "You do
9 have to do it. It is your job." And he said it's
10 my job because he said so. And he was upset. He
11 was hostile. He was argumentative, and he -- he
12 told me that, you know, he really -- he didn't want
13 me telling the chairman -- he was mad that I told
14 the chairman about it. He was mad that I had
15 complained to her about the discrimination as well.

16 And he said several times, "Let me make
17 this clear to you. You report to me and Christina.
18 You report to me and Christina" each time in a
19 louder voice and just -- just very angry and upset
20 with me for trying to find out why I got this
21 race-matched job assignment.

22 And let me see -- what else do I
23 remember. There may be other things included in the
24 narratives that I've already provided to you
25 regarding this conversation; but as I sit here right

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1 now, I don't recall anything else that I haven't
2 already told you or given to you.

3 Q Is the excerpt in Defendant's Exhibit 3 a
4 true and accurate excerpt of that conversation?

5 A It's true and accurate. The only thing I
6 wanted to add was is that it is an excerpt.

7 Q Now, you said that you complained about
8 the discrimination to the chairman --

9 A Well -- I'm sorry.

10 Q Let me ask my question.

11 A Yeah. I'm sorry.

12 Q Is that where you cc'd Carole Jean Jordan
13 on Defendant's Exhibit 23?

14 A Yes and no. We talked about it in the
15 car and about why isn't Suzann doing this. And as a
16 matter of fact, I remember the chairman telling me
17 that Suzann had coordinated another event for her
18 with this club the first -- when she chartered the
19 club, so Suzann did know all the people that she
20 needed to contact, and for some reason Terry wasn't
21 allowing her to do it. He was forcing me to do it.
22 And so then that would have been the 18th, I guess,
23 and then I did cc the chairman on the e-mail.

24 Q Did you say anything -- did you have any
25 other conversation with the chairman in the car

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1 regarding this assignment?

2 A We just talked about it that day when she
3 was in the car. We -- I'm sorry. Ask the question
4 again, please.

5 Q Did you -- do you recall anything else
6 that was said between you and the chairman about
7 this assignment that day in the car?

8 A Not as I sit here I don't.

9 Q Do you --

10 A Not other than what I've already told you
11 and what's in the material that we've provided.

12 Q Why do you believe the request from
13 Kester involved a race-matched job assignment?

14 A Because as a field director, my
15 responsibility is to coordinate the campaign's
16 activities for the County, and I saw no -- I didn't
17 understand why he was involving me with the -- with
18 this kind of thing with a club. There wasn't any
19 reason for it. And it wasn't protocol, and it just
20 didn't -- I just didn't see any reason for it. The
21 only reason I could see was that I was black and he
22 didn't want to deal with them or he felt
23 uncomfortable dealing with them, and he didn't want
24 Suzann to deal with them. I just -- can you repeat
25 the question again?

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1 MR. McKENNA: Would you read it back?

2 (The Reporter read as requested.)

3 A In addition to what I already said, I
4 thought it was a race-matched job assignment because
5 it wasn't the first time that this had happened.
6 The vice chairman asked me to help these folks out,
7 and then I had to go to the African-American
8 round-table, and, you know, I had -- I had, you
9 know, met with Johnny Hunter several times. I had
10 listened to him. I told him about my experiences as
11 a club chairman. I told him about the things that
12 my club used to do in the College Republicans. I --
13 I shepherded him along, and I gave him the stuff
14 that we give county chairmans, the Grass Roots
15 Development Handbook. I went through that with him,
16 and then I went through the Grass Roots Leadership
17 Book with him.

18 And then I'm getting more and more
19 dragged into the minutia of a club, and I just saw
20 no reason for it, and it kept happening over and
21 over again. Just one problem after the next, and
22 every time they had a problem, whether it was his --
23 their expenses or an event that they were supposed
24 to go to or whatever, wherever it was, they were
25 coming to get me, and I just did not want to be

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1 professionally associated with that.

2 Q Any other reason why you believe that it
3 was a race-matched job assignment?

4 A There is lots of reasons, but the main
5 one was the way that the situation was handled, the
6 way that Terry did not want to communicate with the
7 group at all. He wouldn't allow Chris -- Suzann to
8 communicate with the group, and I guess he thought I
9 was the only one who could talk to them because I'm
10 black. And I saw no reason for him -- for them to
11 get me involved with something that is always
12 Suzann's responsibility.

13 Q Any other reasons?

14 A I'm finished.

15 Q Are there any other reasons?

16 A I've given you all the reasons that I can
17 think of as I sit here today. I'm finished.

18 Q Do you know who Morland Warner Harrell
19 is?

20 A Yes.

21 Q Was she not involved with the Young
22 Republican Club?

23 A She was involved with the Young
24 Republicans. She is a young Republican.

25 Q And she was involved in the Young

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1 Republican Club as part of her responsibilities as a
2 field director. Isn't that true?

3 A No, that's not true.

4 Q Not true. Wasn't --

5 A I think --

6 Q Wasn't that lady also involved with the
7 Teenage Republican Club?

8 A Well, it was the Teenage Republicans that
9 she was involved with, not the College Republicans.

10 Q And she wrote their charter, didn't she?

11 A Yes, she did.

12 Q As part of her assignment as a field
13 director, didn't she?

14 A No. Actually, Morland's title was field
15 director/youth director.

16 Q How do you know that?

17 A That's what's on her business card, and
18 it was on our website under her title.

19 Q Now, as far as the Saramana event that
20 you were opposed to dealing with, you were actually
21 speaking at that event, weren't you?

22 A The Saramana event in November?

23 Q Yes, ma'am.

24 A No. I never spoke at the event.

25 Q Would you like to look at Exhibit 23 and

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1 look at the last time slot on the event?

2 A I see that. I don't know why that's
3 here, but I was never supposed to speak at the
4 event.

5 Q But the schedule has you listed as a
6 speaker, doesn't it?

7 A It doesn't have me listed as a speaker.
8 It says to thank the members.

9 Q Could you thank the members without
10 speaking?

11 A Well, I suppose maybe they wanted me to
12 come up on the stage or -- I don't exact -- I don't
13 exactly know, but -- hold on a second.

14 This is wrong. It's got a lot of
15 inaccuracies in it. Katherine Harris wasn't even at
16 the event. I didn't -- and she didn't -- Ms. Harris
17 didn't speak at the event. I didn't speak and
18 wasn't planning on speaking.

19 And the vice chairman is nowhere on this
20 thing, and he had originally been -- he was on the
21 actual itinerary, the program for the event. And
22 then instead of him coming, the chairman came and
23 spoke, but he's not even on here.

24 And I don't know. It looks like
25 somebody's -- like she tinkered with it. And I

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1 didn't -- I didn't really inspect this before I
2 forwarded it to the office. I just -- I got it. I
3 had been waiting on it. I forwarded it to the
4 office; and as soon as I got Mrs. Rice's fax, I
5 forwarded that to the office as they demanded.

6 Q Are you in the habit of sending things --
7 forwarding things to the Republican Party of Florida
8 without reading them first?

9 A Repeat the --

10 Q Were you in a habit of forwarding things
11 to the Republican Party of Florida without reading
12 them first?

13 A That's not what I said, Mr. McKenna.
14 This is apparently the time line that Suzann had
15 been e-mailing about. And, you know, it's their
16 event; and, you know, I guess, you know, they can
17 have it any way they want, but, you know, I can't
18 control -- I can't control what they put down as
19 their time line. And I really -- you know, I can't
20 answer for people.

21 Q I didn't ask about other people. I asked
22 you if you were in the habit of forwarding things to
23 the Republican Party of Florida that you had not
24 read first.

25 A Not usually.

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1 Q Now, isn't it true, ma'am, that you
2 wanted to do African-American outreach at the
3 Republican Party of Florida?

4 A No, that's not true.

5 Q You did not present a proposal in which
6 you requested to do minority outreach to the
7 Republican Party of Florida?

8 A Which proposals are you talking about?

9 Q Isn't it true that you made a proposal to
10 the Republican Party of Florida in which you asked
11 to do African-American outreach on behalf of the
12 party?

13 A I never asked to do African-American
14 outreach on behalf of the party.

15 (Exhibit 25 marked for identification.)

16 Q I'm going to hand you what we've marked
17 for purposes of identification as Exhibit 25 and ask
18 you if you recognize that document.

19 A Uh-huh. I sure do.

20 Q And is that not your proposal for the
21 creation of a minority outreach department in the
22 Republican Party of Florida?

23 A This is a proposal that I worked on, but
24 there is not one word or sentence in here that says
25 that I, Nadia Naffe, wanted to do this.

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1 Q I see. So you didn't want to do it. Is
2 that your testimony?

3 A I'm answering your question.

4 Q I'm asking you a question. Is that your
5 testimony, that you did not want to do minority
6 outreach with the Republican Party of Florida?

7 A I didn't want to be pigeonholed to work
8 exclusively with black Republicans. I wanted to
9 work with all the Republicans in Florida, and that's
10 why I didn't want to work for one specific
11 candidate. I wanted to work with all the
12 candidates, and that's why I wanted to work for
13 RPOF.

14 Q So you wanted to do some minority
15 outreach with African-Americans but not
16 exclusively. Is that your testimony?

17 A No, that's not -- that's not what I
18 meant. I don't want you to misunderstand me to say
19 I dislike working with African-Americans, because
20 that's not what I'm trying to say at all.

21 What I'm trying to say is, is that I was
22 interested in the job that Jamie Miller presented in
23 his e-mail to me working within my territory, with
24 my counties as a field director, working on grass
25 roots projects, voter registration drives, campaign

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1 events, voter integrity programs. Those were the
2 types of things that attracted me to the position in
3 the first place, and those were the types of things
4 that I expected to be doing.

5 Florida is a diverse state, and I didn't
6 want to be stuck working with one group of people,
7 and -- I didn't want to be stuck working with one
8 group of people. I wanted to work with all the
9 Republicans in Florida.

10 Q So you wanted to work with the African
11 Americans as well as the whites. Is that correct?

12 A I didn't say that, Mr. McKenna. In fact,
13 on the very first page it says, "I fully believe
14 that Minority Outreach should include all
15 minorities."

16 "All minorities" are women, Hispanics,
17 and that's Mexicans, Latinos. That's Teenage
18 Republicans. That's College Republicans, and the
19 only people that aren't exclusive to technically
20 minorities are white males, such as yourself. But I
21 wanted to work with all the Republicans in Florida.

22 Q Are you finished with your answer?

23 A Yes, sir.

24 Q Okay. The very first line of the second
25 paragraph states "that there are nearly 1 million

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1 black voters here in Florida." Do you see that,
2 ma'am?

3 A Yes.

4 Q Do you reference women anywhere in there?

5 A Well --

6 Q Do you reference women anywhere in there?

7 A Explain what you mean by "women."

8 Q Do you have the word "women" in the
9 second paragraph of Exhibit 25?

10 A Women are included in the 1 million black
11 voters. Myself and your colleague, Ms. Siler-Nixon,
12 would be included in that 1 million, and it's not
13 exclusive. You know, African-American people come
14 in two types, male and female.

15 Q Do you reference Hispanics anywhere in
16 there?

17 A Hispanics are -- I don't reference the
18 different minority groups by name, but, as I said
19 again, I said in the last paragraph, "I fully
20 believe that Minority Outreach should include all
21 minorities." And the vice chairman is educated
22 enough to know what "all minorities" are, and he's
23 also intelligent enough to know that 1 million black
24 voters doesn't just mean men, it means black voters.

25 Q But you ignored the first part of that

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1 sentence, ma'am. It says, "This proposal is
2 somewhat exclusive to African-Americans," doesn't
3 it?

4 A Yes, it says that.

5 Q Now, if you turn to the second page, it
6 starts off referencing "African-Americans represent
7 13 percent of" the Florida "population." Do you see
8 that, ma'am?

9 A Yes, sir.

10 Q Did you research that?

11 A I got that from materials I got from
12 RPOF.

13 Q So you researched it?

14 A Well, no. I just assumed that the
15 materials that they gave me were correct.

16 Q Okay. And then in the second paragraph
17 you reference the black vote, don't you, on several
18 occasions?

19 A The second paragraph is statistics from
20 the last -- from 2000 -- from the 2000 election and
21 the 1996 election.

22 Q And you reference black voters, don't
23 you?

24 A Yes.

25 Q Twice?

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1 A The word "blacks" or "black voted" is in
2 here twice.

3 Q Okay. And your next paragraph leads off
4 with, "African-Americans traditionally vote
5 overwhelmingly for Democratic candidates." Is that
6 correct?

7 A Yes.

8 Q Then going down to the third paragraph,
9 you said you proposed the creation of a new
10 department within the RPOF. Do you see that, ma'am?

11 A Yes, I see it.

12 Q And who did you -- go ahead.

13 A I'm just trying to separate --

14 Q Are you finished with your answer?

15 A No. Ask your question again.

16 Q Yes. Do you see where it says, "I
17 propose the creation of a new department within the
18 RPOF"? Do you see that?

19 A Yes, sir.

20 Q Good. Now, who did you propose would be
21 within that department?

22 A Well, I didn't actually propose it. I
23 didn't write that part. Johnny Hunter wrote that
24 part.

25 Q Who did you expect would be within that

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1 new department within the RPOF?

2 A Johnny Hunter.

3 Q Anybody else?

4 A The folks in Johnny Hunter's club,
5 because it was the clubs who were developing other
6 clubs, and that was the -- the chairman and the vice
7 chairman wanted to use the same model that she had
8 used as head of the Florida Federation of Republican
9 Women.

10 The chairman and the vice chairman
11 thought the best way to build a coalition of black
12 Republicans was to use the club method that her
13 club -- that her organization had always used, so
14 they appointed Johnny Hunter to do that, and they
15 gave him a seat on our board. And then it became
16 his responsibility, and, you know, his club was
17 working with him to develop these other clubs.

18 Q Are you finished?

19 A Yes, sir.

20 Q And it's your sworn testimony under
21 penalty of perjury that you had no interest in
22 working in this new department. Is that correct?

23 A Repeat the question again.

24 Q Sure.

25 MR. McKENNA: Read it back.

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1 (The Reporter read as requested.)

2 A Mr. McKenna, I want to be very clear
3 about my answer. I do not dislike working with
4 African-Americans at all. This wasn't a
5 situation -- this was not a situation where the
6 field directors took turns going to the African-
7 American round-table. This wasn't a situation where
8 all the field directors took turns with these
9 assignments or with the issues that came up with the
10 black Republicans.

11 I got stuck with it all the time, and I
12 didn't want -- I wanted my career to be on the same
13 professional track as the other field directors, and
14 I saw having to be involved with the minutia that
15 went -- with these clubs, I saw it almost as a
16 demotion really, because instead of me doing my
17 county-wide work, I had to be stuck baby-sitting
18 this club and their issues and their problems and
19 making sure people showed up on time at the African-
20 American round-table and all this other stuff, and I
21 did not want to do that.

22 And I just want to -- I want to be very
23 clear because, you know, I sort of feel like you're
24 trying to push me to say that I dislike working with
25 black people, and that is not it at all. I didn't

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1 want to be pigeonholed. I -- all my other
2 colleagues in their respective territories have gone
3 on and -- or they're still in their positions or
4 they've gotten better political jobs.

5 Nobody, none of them, wanted to go to
6 these African-American round-tables. In January I
7 tried to get somebody to switch with me to go to one
8 of these African-American round-tables. Nobody
9 wanted to go. None of them wanted to be stuck with
10 it. We had several different meetings. We had
11 credentials. We had budget. We had constitutional
12 and technology committees, you know, and the other
13 field directors got to rotate off which committee
14 meeting they went to at each board meeting.

15 I got stuck with the same mess. Every
16 time it was the same mess, and I didn't want to be
17 -- I didn't want to be associated with the problems
18 and the issues of this group. Not to say that I
19 dislike working with African-Americans, because I
20 don't. You know, I think if the RPOF wants to do
21 outreach, you know, more power to them, but I don't
22 want to be -- I don't want -- I didn't want my
23 career to be held back because I was stuck doing
24 this kind of thing. I didn't want to be known as,
25 you know, "Go to Nadia, the field director -- the

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1 black field director over here when, you know, you
2 have a problem with, you know, one of these black
3 Republican clubs or if you want one of these black
4 Republican clubs to do something for you."

5 I wanted to be known as the field
6 director who did a great job coordinating a
7 presidential rally for my own intellectual
8 capabilities, not to baby-sit this mess, and that's
9 the way I saw it. I saw this as just -- it was one
10 thing after the other, and it was just a big mess,
11 and I didn't appreciate the mess being dumped in my
12 lap.

13 Q Are you finished?

14 A Yes.

15 Q Is it your sworn testimony under penalty
16 of perjury that you had no interest in working in
17 this new department of minority outreach that you
18 proposed for the RPOF?

19 A No, I worked in it when they told me to,
20 and I did the projects that -- that I was told to
21 do. And that's -- that was part of what the
22 conversation with Terry was about, and he made it
23 very clear, "This is your responsibility to do
24 this. This -- you're going to do it because I told
25 you to." And --

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1 MR. McKENNA: Move to strike as
2 nonresponsive to the answer.

3 BY MR. McKENNA:

4 Q Ma'am, the question is this. Did you
5 want to work at all in the new department that you
6 proposed for the RPOF?

7 MR. THOMPSON: Object to the form.

8 MR. McKENNA: What's wrong with it?

9 MR. THOMPSON: Presupposes that she's
10 the one who proposed it. She's testified
11 differently.

12 THE WITNESS: And --

13 MR. McKENNA: Fine.

14 THE WITNESS: -- I have a problem with
15 your question. I wish you would ask it a
16 different way. I told you before --

17 BY MR. McKENNA:

18 Q Okay. What don't you understand about my
19 question?

20 A Well, what Jim said. And, I mean, I
21 already told you before, you know, no, I did it when
22 they told me to do it. I already told you that
23 there ain't a sentence in here anywhere that says,
24 "I, Nadia Naffe, wanted to do it." This is a work
25 assignment, and it's, you know -- this talks about,

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1 you know, matching facts with issues and talking
2 points for the clubs.

3 This is all about stuff for the clubs to
4 do, you know. And, you know, my understanding was
5 the whole reason why the chairman appointed Johnny
6 Hunter and gave him all these responsibilities was
7 because she wanted him to -- him and his clubs,
8 since they were doing a good job on their own, to
9 help develop the other clubs.

10 And then when they start having issues
11 and problems with him and his club, then they
12 started pulling me into all this other stuff. And,
13 you know, like I said before, you know, if they want
14 to -- if they want to do minority outreach, I think
15 that that's great, but, you know --

16 Q Are you finished?

17 A -- don't -- when I'm finished, sir, I
18 will let you know -- don't -- don't drag me into
19 your problems, you know. I really believe that
20 Terry had a huge issue dealing with Johnny Hunter at
21 peer level. He just -- just did not want to deal
22 with the guy. And I don't know if he was
23 intimidated by the guy or -- I -- I don't know what
24 it was, but it seemed to me -- and I never had
25 really any difficulties dealing with Johnny Hunter

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1 at all or the folks in his club. You know, they're
2 nice folks. I'm done.

3 MR. ISLER: I'm going to interject
4 here. Jim, I would encourage you -- and if
5 you want to take a break and talk with your
6 client, that's fine.

7 Mr. McKenna has asked the same question
8 three times. It's a very simple question,
9 which is with regard to this proposal -- which
10 she has called "my proposal" in the very first
11 sentence of it -- to create a minority
12 outreach department within the RPOF.

13 The question that is still pending is:
14 Is she testifying under oath that she did not
15 have any interest in being a part of this
16 department. That's the only question that's
17 been pending for the last ten minutes.

18 MR. McKENNA: More than that.

19 MR. ISLER: And it's been asked three
20 times, and your client has not answered the
21 question. It's a simple question. Did she
22 want to be a part of this department or not?

23 THE WITNESS: Every single time I said
24 no and then I followed it up with other
25 comments, and that's the way you told me that

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1 you wanted me to answer.

2 BY MR. McKENNA:

3 Q So your answer -- so your sworn testimony
4 is that you had no interest in being a part of the
5 minority outreach department within the RPOF. Is
6 that correct?

7 A Can you ask your question a different
8 way?

9 MR. McKENNA: Can you read it back?

10 (The Reporter read as requested.)

11 A No, I did not want to be a part of the
12 department, because I was happy doing what I was
13 doing as a field director. And in addition to that,
14 I'll state again for the record, I wanted to work
15 with all the Republicans in Florida no matter what
16 color they are. I wanted to -- or gender they are.
17 I wanted to work with all the Republicans in
18 Florida. I didn't want to have my work assignments
19 pigeonholed, and I can't imagine how clearer I can
20 be than that.

21 And I do want to take a break now.

22 That's the end of my answer.

23 (Recess from 12:36 to 12:54 p.m.)

24 BY MR. McKENNA:

25 Q Now, do I understand you to say, ma'am,

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1 that your proposal, Defendant's Exhibit 25, was an
2 assignment?

3 A Yes.

4 Q From whom?

5 A It was actually something that Hilda was
6 working on before she got fired. And apparently
7 when she left, she took mostly everything with her,
8 and -- well, I'm finished.

9 Q The question, ma'am, was: Who gave you
10 the assignment?

11 A I was working on it originally with
12 Hilda.

13 Q Who gave you the assignment?

14 A I just told you Hilda Stringer.

15 Q And what was her position?

16 A She had Christina's position. She was
17 deputy director of party development, and --

18 Q When you -- go ahead.

19 A I'm not going to say anything else.

20 Q And when you said "when she left she took
21 almost everything with her," what did you mean by
22 that?

23 A Well, that's what Geoffrey and Steven
24 said, that they were trying -- that there was things
25 up in the air and -- but that Hilda took it all with

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1 her; that they couldn't find any of the stuff,
2 and -- so right around the time of the -- right
3 around the time of the round-table on November 7th,
4 none of the folks from the Black Republicans had
5 gotten any invitations or notice of the event, and
6 Hilda had always -- Hilda had always done that.

7 She had always sent them invitations to
8 our quarterlies and stuff like that, so that's why
9 Johnny Hunter was writing letters of complaint to
10 Terry, because in the past the RPOF -- there was a
11 precedent. Hilda had always sent out these notices
12 and all of this other stuff; and when she left, it
13 stopped happening.

14 Q Did she take something with her related
15 to Exhibit 25?

16 A Exhibit 25?

17 Q Your proposal.

18 A No. The proposal wasn't finished when
19 she left.

20 Q Okay. You finished the proposal?

21 A Well, what -- basically I just started
22 from scratch, because nobody -- I mean, I knew the
23 types of things -- she had a list of things that she
24 was going to put in the proposal. She -- after each
25 one of these African-American round-tables she would

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1 do minutes of the round-table. And basically what I
2 did to recreate it was I just went down her notes.
3 I just sort of followed her notes. And I got input
4 from Johnny Hunter as well, but she -- they were
5 like two or three sets of minutes from these
6 African-American round-table that Hilda took, and I
7 just sort of followed what she was thinking there.

8 Q What race was Hilda Stringer?

9 A She was Hispanic.

10 Q How do you know that?

11 A Because she told me -- A, because she
12 told me; B, because she spoke Spanish, and I think
13 she -- I think she was Cuban, because even though
14 she was my boss, she still had to cover Miami/Dade.

15 Q Can you turn to page 3 of your proposal
16 for me, please?

17 A Yes, sir.

18 Q It refers to in the first paragraph, "One
19 of the most crucial steps in this process is to have
20 black Republicans talk to other blacks." Do you see
21 that, ma'am?

22 A I see it.

23 Q And do you believe that's a true
24 statement?

25 A Well, I didn't write that. Johnny Hunter

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1 wrote that part, and I can't -- I can't really
2 testify for other people.

3 Q I'm not asking you to testify for other
4 people. I'm asking you what you think. Do you
5 think that --

6 A I'm not here to give opinions.

7 Q Do you think that's a true statement?

8 A I'm not here to give opinions, and I'm
9 not going to give opinions.

10 Q Are you refusing to answer the question?

11 A No. I told you that I am not here to
12 give opinions.

13 Q Okay.

14 MR. THOMPSON: Ms. Naffe, he can ask an
15 opinion question if he wants.

16 A Well, repeat your question.

17 MR. McKENNA: Read it back, please.

18 (The Reporter read as requested.)

19 A Is what a true statement?

20 Q That "One of the most crucial steps in
21 this process is to have black Republicans talk to
22 other blacks."

23 A No, I don't think that that's the most
24 crucial step in the process.

25 Q I didn't say it was the most crucial

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1 step.

2 A That was your question.

3 Q I said it was "One of the most crucial
4 steps in this process is to have black Republicans
5 talk to other blacks." Do you believe that to be a
6 true statement or not?

7 A I would have to say no. It depends a lot
8 on the person and their personality, because I feel
9 comfortable talking to just about anybody. I
10 mean -- and it's like I feel comfortable talking to
11 Eddie Isler. I feel comfortable talking to Hilda.
12 I feel comfortable talking to your colleague, Dawn.
13 I feel comfortable talking to my attorney, and their
14 race doesn't matter to me.

15 I would talk to them just the same, you
16 know, if there was a specific issue or -- if there
17 was a specific issue that I was campaigning to get
18 someone to support, it wouldn't really matter to me,
19 you know. I'm receptive to hearing all different
20 types of viewpoints. That's my opinion.

21 Q Are you finished?

22 A Yes.

23 Q So you put something into your proposal
24 that you didn't agree with?

25 MR. THOMPSON: I'm going to object to

1 form.

2 A Well, I told you, you know, Johnny Hunter
3 wrote that part. And, see, the thing is, this is
4 all really his bailiwick, you know. He's the chair.
5 The party, you know, gave him an appointment, and,
6 you know, it's really -- and then he's the chairman
7 of the Florida Federation of Black Republicans. So
8 he really oversees what the clubs do and how they
9 communicate with black Republicans in the community;
10 and if he feels that way, then that's the way he
11 feels, and that's the way he's going to, you know,
12 run his program.

13 And that's -- that's, I think, one of the
14 reasons why he didn't want to work for the RPOF. He
15 told them that he didn't want a salary for anything
16 that he was doing. He said all he wanted was to
17 have his expenses reimbursed.

18 And later on I asked Johnny why he didn't
19 want to get paid for all the work he was doing, and
20 he said because he didn't want the RPOF telling him
21 what to do. And this is probably an example of
22 that; but, you know, I didn't -- I wasn't going to
23 sensor the guy. I really didn't think that that was
24 my role, and I'll tell you the parts that I worked
25 on.

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1 I worked on all the political parts. I
2 worked on the statistics and stuff like that, that
3 stuff that I got from documents the RPOF gave to me
4 or some of the -- we've got handouts from the RNC as
5 well. The facts with issues, I did that. I think I
6 did the talking points.

7 So all the political stuff and the
8 statistical stuff is stuff that I did. The rest of
9 this stuff, you know, I can give you opinions about
10 it, but I can't really speak to, you know -- you
11 know, I can't give testimony for another person. I
12 don't know what he was thinking.

13 Q So you took credit for Mr. Hunter's work?

14 A No, I -- I didn't take credit for
15 Mr. Hunter's work.

16 Q Is it submitted from you and him?

17 A Well, yes and no. I e-mailed it to the
18 vice chairman, but he's actually the one who
19 presented it to the vice chairman.

20 Q Is Mr. Hunter's name in here anywhere?

21 A Yes. I cc'd him on it.

22 Q Is he indicated as an author?

23 A What do you mean? Well -- well, not --
24 the document is actually in two parts. The first
25 part of the document is a letter, and then the

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1 document itself -- you know, I didn't footnote it or
2 anything like that, because the stuff that I used to
3 write it with was all our internal stuff.

4 So I didn't feel like I was plagiarizing
5 or anything like that, because it was all internal
6 stuff, and none of the stuff I used said that, you
7 know, a certain author researched certain specific
8 facts or certain specific statistics. So, I mean, I
9 guess on page 5 I could have footnoted and said --
10 but you know what? I just did this real quick, and
11 I didn't really go through all that effort.

12 Q On the first page it says, "Please find
13 attached my proposal," doesn't it?

14 A Yes, sir, it does.

15 Q It doesn't say, "Please find attached
16 mine and Johnny Hunter's proposal," does it?

17 MR. THOMPSON: Object to the form.

18 A That's -- no, sir, it doesn't. That's
19 just my phraseology. It was, you know, a letter
20 that I typed up really quick and -- but it does --
21 it does discuss in great detail Johnny Hunter in the
22 context of his club, his -- I mean, it -- it is
23 because of his club really cultivating the
24 chairman's attention and it's because of their
25 efforts that the RPOF wanted to move forward with

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1 this.

2 And it talks about the Black Republican
3 Clubs, and we talk about our commitment to reaching
4 out to all Floridians, which was always my goal to
5 reach out to all Floridians. And it talks about the
6 African-American round-tables, and he chairs that.
7 And, you know, it says very clearly that this is
8 just a road map, you know. It's just, you know, a
9 road map; and whatever they wanted to do, you know,
10 however they wanted to do it, you know, more power
11 to them. But the RPOF thought -- the chairman and
12 the vice chairman thought the club method, which was
13 the tried-and-true method of recruiting people into
14 the party, would be the best way to recruit black
15 Republicans into the party.

16 Q Are you finished?

17 A Yes.

18 Q Turn to page 3 again. It says that
19 "Blacks are more likely to feel comfortable
20 discussing the issues with another person of color
21 than anyone else." Do you see that, ma'am?

22 A Yes, sir.

23 Q Do you agree with that statement?

24 A Again, I did not write this -- I did not
25 write that part, because I don't -- I don't like to

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1 write like that. I like to write things that are
2 like facts. And that's why, if you see, that
3 there's a difference in the way that this part is
4 written and the examples of matching facts with
5 issues. You know, I'm much more succinct and I
6 just, you know, pulled specific things out of RPOF
7 and RNC handouts that we already had, material that
8 we were already using.

9 You know, this kind of stuff I would say
10 Johnny Hunter has from his own personal experience,
11 which is going to be different than mine, because he
12 grew up during a different time than I did. You
13 know, he grew up during a segregated time, and, you
14 know, maybe -- maybe he feels that way, and, you
15 know, maybe folks in his age group feel that way.

16 Q Are you finished?

17 A Yes, sir.

18 Q Do you agree with the statement, "Blacks
19 are more likely to feel comfortable discussing the
20 issues with another person of color than anyone
21 else"?

22 A Yes and no. I don't really know how to
23 make you understand, but it depends on what the
24 issue is. I would say issues like healthcare,
25 social security, national defense -- I think those

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1 issues are pretty colorblind. And, you know, I
2 would say that a white person -- a white American
3 and a Hispanic American and a black American would
4 all agree that we need to defend our country. And a
5 black person wouldn't necessarily need to talk to
6 another black American to have that point come
7 across.

8 I think that across the board, you know,
9 different races of people would agree that we need
10 to defend our country. Now, how we go about
11 defending our country is another story, but I don't
12 think that that sub-issue is necessarily a race-
13 related issue either.

14 Now, if you are talking about economic
15 development in a poor black neighborhood, which is
16 the case in Johnny Hunter's community, he -- his
17 office is around the corner from a project home.
18 You know, the folks in that project home -- if he's
19 trying to reach out to those folks, you know, those
20 folks, you know, they -- they're around other black
21 people all the time, so maybe those folks would only
22 feel comfortable talking to another black person.

23 I don't know. Everybody is different.
24 Everybody has a different vantage point. But, you
25 know, I could -- I'd talk to whoever and debate the

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1 issues. You know, it doesn't -- it doesn't matter
2 to me. And, you know, it maybe has a lot to do with
3 upbringing and, you know, a lot of other things,
4 but -- I know this is a long answer to your
5 question, but the answer is yes and no.

6 Q Do you agree with the statement that
7 "Blacks are more likely to visit the polls and vote
8 Republican if encouraged to do so by another black
9 person"?

10 A I don't agree with that.

11 Q Why not?

12 A Well, I can speak from my own
13 experience. The person who encouraged me to vote
14 Republican wasn't black. They just presented things
15 in a way that I agreed with, and it has a lot to do
16 with presentation. I think if any person reached
17 out to another person and told them to vote a
18 certain way, they would listen. It's not something
19 that people do a lot. In fact, that's in our Grass
20 Roots Development Book. It's in RPOF's Grass Roots
21 Development Book, you know, just -- personal contact
22 is the No. 1 reason why someone's going to go to the
23 polls.

24 It's just like going to church. Pastor
25 Witten says it every week; you know, "Invite your

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1 neighbors to church. Invite your co-workers,
2 colleagues to church." People are more likely to go
3 to church if it's someone that they know inviting
4 them.

5 It doesn't necessarily have to be a black
6 person or a person of the same color as you. And I
7 think it would be pretty narrow-minded to say that,
8 you know, the only way you're going to do something
9 is if somebody of your same race is going to ask you
10 or somehow persuade you to do something.

11 Q Did you tell Johnny Hunter you disagreed
12 with these statements?

13 A No.

14 Q Why not?

15 A Because I didn't really think it was, you
16 know, my place. I thought that, you know, it was --
17 I thought it was -- what's the word I'm looking
18 for? I think it's -- it's perceptual, you know. I
19 don't think it's -- you know, I just thought it was
20 something that if he wanted to pursue -- if he
21 wanted to pursue developing the clubs that way, I
22 thought, you know, there's lots of different
23 management styles and leadership styles, you know.
24 You probably have a different style than Jim, and he
25 probably has a different style than -- I don't

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1 know -- Rhea Law or Lash Harrison; somebody like
2 that.

3 And that's the way he wants to do it, you
4 know. And I saw no reason why, you know, I should,
5 you know, stand in his way, you know, if that's the
6 way, you know, he's always done it or whatever. And
7 nobody at RPOF disagreed with the way that he was
8 doing it.

9 Q Did you complain about having a proposal
10 submitted under your name that had those statements
11 in them?

12 A No.

13 Q Why not?

14 A Well, I told you before: If that's the
15 way that -- if that's going to be the way that --
16 it's Johnny Hunter's responsibility to develop the
17 clubs. That's what the chairman -- and unite the
18 clubs under one organization.

19 The chairman didn't say he had to do it a
20 specific way. He was just appointed to do that, and
21 there's a lot of different ways to do it. And he
22 had been pretty successful doing it just like that,
23 so if, you know -- if that works for him, you know,
24 more power to him.

25 Q Now, you submitted this proposal on

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1 October 8, 2003. Is that correct?

2 A That's the day that it's dated, but I'm
3 not certain which day I e-mailed it.

4 Q Was it close to that day?

5 A I believe so.

6 Q It was in a day or two?

7 A I think so.

8 Q Did you present the -- well, let me
9 strike that.

10 So you sent the copy of it to Carole Jean
11 Jordan, Geoffrey Becker, Steven Shiver, Carol Carter
12 and Johnny Hunter. Correct?

13 A Okay. I'll tell you who I remember
14 sending it to, and I'll tell you who I don't
15 remember sending it to. I think I sent it -- I'm
16 sure I sent it to the chairman. I don't see the
17 vice chairman's name on here, but I'm sure I sent it
18 to the vice chairman, because he was really the main
19 one with this thing. And Johnny already had a copy
20 of it because he was working on parts of it. So I
21 think there is -- well, my answer is I'm not sure.

22 Q Okay. Did you ever send it to other
23 people?

24 A Maybe.

25 Q Do you recall sending it to anybody else?

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1 A I may have. It was a long time ago. I
2 don't remember.

3 Q You don't remember as we sit here today
4 whether you sent it to anybody else. Is that your
5 testimony?

6 A I just told you I might have, but I don't
7 remember.

8 Q Okay.

9 (Recess from 1:18 to 2:09 p.m.)

10 (Exhibit 26 marked for identification.)

11 BY MR. McKENNA:

12 Q I'm going to hand you what's been marked
13 for purposes of identification as Defendant's
14 Exhibit 26 and ask you if you recognize that
15 document.

16 A Yes, sir, I recognize the document.

17 Q It's your e-mail to Carole Jean Jordan.

18 It begins, "Chairman,

19 "I don't know if Jamie" -- and that's

20 Jamie Shiver?

21 A Jamie Miller.

22 Q Jamie Miller -- "ever told you of my
23 interest to work on Minority Outreach projects." Do
24 you see that, ma'am?

25 A Yes.

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1 Q So you did have an interest in working on
2 Minority Outreach projects with the Republican Party
3 of Florida. Isn't that true?

4 A Yes. As I told you before, Mr. McKenna,
5 I wanted to work --

6 Q You only have to say yes. That's all you
7 really have to say.

8 A You are not going to control my answers.
9 You said in your instructions that if I want to add
10 more information to a statement to answer yes or no
11 first and then add the rest of the information on
12 the back. So don't try to control my answers. I'm
13 going to give you the answer, and your question was
14 did I say that, and it's right there. I did say
15 that.

16 And what I was going to add was I told
17 you that I don't -- it's not that I don't like
18 working with African-Americans. I didn't want to
19 get pigeonholed with having these projects over and
20 over and over again.

21 I told you that I wanted to work with all
22 the Republicans in Florida regardless of their
23 color. And it says, "Minority Outreach projects."
24 It doesn't say anything about a Minority Outreach
25 department. And, you know, that's -- that's the

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1 language of your questions before we went on break,
2 and -- that's the end.

3 (Exhibit 27 marked for identification.)

4 Q I'm going to hand you what's been marked
5 for purposes of identification as Defendant's
6 Exhibit 27 and ask you if you recognize that
7 document.

8 A Yes, sir, I recognize the document.

9 Q And it's another e-mail from you to
10 Geoffrey Becker indicating that you wanted to share
11 this, being your Minority Outreach program --
12 proposal -- with him. Is that correct?

13 A No, that's not exactly what it says.
14 It's not another e-mail about it. This is -- this
15 is actually -- this is the e-mail that I sent when I
16 sent the -- when I cc'd him the proposal itself.
17 And it says: "I wanted to share this with you, some
18 ideas" and "It is obviously something near and dear
19 in my heart" that -- you know, like I said it is.

20 Q Anybody who read it would have assumed
21 you wanted to do Minority Outreach, wouldn't they?

22 MR. THOMPSON: Object to the form.

23 A That's not what I said.

24 Q That's my question, ma'am.

25 MR. THOMPSON: Object to the form.

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1 A No, it doesn't say that anywhere in
2 there. It says "some ideas." These are just ideas.

3 Q It says, does it not, that it's something
4 near and dear to your heart?

5 A Yes.

6 Q Yes. And so someone reading that could
7 certainly conclude that you wanted to do Minority
8 Outreach, couldn't they?

9 MR. THOMPSON: Object to the form.

10 A Well, that depends on what the meaning of
11 "is" is.

12 Q Bill Clinton.

13 A I think I'm finished, unless you have
14 another question about this.

15 Q On January 23, 2004 you contend that you
16 complained to Christina Sheppard about the African-
17 American round-table. Is that correct?

18 A She is among the people I complained to.

19 Q To -- well, we've already had this
20 discussion, ma'am, and we had determined that we had
21 listed all of your complaints to the RPOF. So whom
22 else did you --

23 A No. No. No. No. No. No. No. The
24 last time we talked about this you said something
25 about six complaints, and I stopped you right then

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1 and there because I -- I am not agreeing with you
2 that there were six complaints; and, no, we did not
3 discuss this or agree on this.

4 Q To whom else did you complain about your
5 -- about the RPOF?

6 A On January 23rd?

7 Q No. Ever. Ever. Are you refusing to
8 answer the question, ma'am?

9 A No. You haven't given me enough time to
10 answer it. I'm thinking about your question.
11 Whom -- can you say the question again in a
12 different way?

13 Q Who did you complain to about the RPOF?

14 A About discrimination, you mean?

15 Q Yes, ma'am.

16 A I complained to Terry first and the
17 chairman and Christina and Geoffrey, and I wrote
18 Robert a letter about it, and I told Robert about it
19 when he called me, and Andy Palmer. I told Andy
20 about it. I talked to Johnny Hunter about it. I
21 talked to Reverend Thomas about it. I talked to two
22 of my county chairmen about it.

23 Q Who?

24 A Paul Bedinghaus, Bob Starr. I talked
25 to -- do I have to include like pastors --

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1 Q Everybody.

2 A -- attorneys and everybody?

3 Q Everybody.

4 MR. THOMPSON: Not attorneys.

5 MR. McKENNA: The fact that she talked
6 to them?

7 MR. THOMPSON: About it, no. I'm going
8 to instruct you not to answer about anything
9 you discussed with your attorneys.

10 THE WITNESS: Okay.

11 MR. THOMPSON: That's a subject-matter
12 issue, Mr. McKenna, and you know it is.

13 A I'm sure there's other people I talked
14 to. As I sit here right now, I can't remember
15 anybody else off the top of my head, but there may
16 be others.

17 Q Now, on January 23, 2004, you contend
18 that you complained to Christina Sheppard. Is that
19 correct?

20 A Among others, yes.

21 Q On just January 23?

22 A Not -- okay. I'm -- okay. Can you back
23 up a minute? What was the question -- what is the
24 question?

25 Q On January 23, 2004, you contend that you

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1 complained to Christina Sheppard. Is that correct?

2 A Yes.

3 Q Do you contend you complained to anybody
4 else on January 23, 2004?

5 A Yes. I --

6 Q Who?

7 A -- complained to two other people.

8 Q Who?

9 A Geoffrey Becker and Terry Kester.

10 Q And when did you complain to

11 Ms. Sheppard?

12 A I complained to Christina first, I think,
13 because I was trying to see if I could get out of
14 the --

15 MR. McKENNA: Move to strike as
16 nonresponsive.

17 BY MR. McKENNA:

18 Q When did you speak to Ms. Sheppard?

19 A That day.

20 Q When? What time of the day?

21 MR. THOMPSON: Mr. McKenna, she is
22 answering the question.

23 MR. McKENNA: She is not answering the
24 question.

25 MR. THOMPSON: Absolutely.

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1 MR. McKENNA: "When" is clearly related
2 to time. It has nothing to do with how she
3 did it or when she did it or why she did it.
4 It's simply a matter of time.

5 BY MR. McKENNA:

6 Q When did you complain to Christina
7 Sheppard?

8 A It was during the day. It was before the
9 African-American round-table.

10 Q Shortly before?

11 A At some time before the African-American
12 round-table.

13 Q Minutes before?

14 A I -- Mr. McKenna, please. I told you it
15 was before the African-American round-table.

16 Q Right. And the question is: How long
17 before?

18 A I don't remember exactly how long, but it
19 was before -- some time before.

20 Q After lunch?

21 A Mr. McKenna, I don't remember the exact
22 time of the African-American round-table to tell you
23 exactly what time.

24 Q I'm not asking exactly what time. I'm
25 asking you if you know whether it was after lunch or

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1 not.

2 A I don't remember if it was --

3 Q All right. And what did you say to

4 Ms. Sheppard?

5 A I told -- I asked Christina first if I
6 could switch my staff assignment, if I could switch
7 with one of the other field directors and have one
8 of the other field directors go to the African-
9 American round-table and maybe I go to one of the
10 other committee meetings like technology committee
11 or credentials or something other than -- something
12 other than the African-American round-table.

13 Q Okay. What did Ms. Sheppard say?

14 A She -- she was -- she said -- one of the
15 things she said was, "Why would you want to go
16 anywhere else other than the African-American
17 round-table?" And then -- I can't remember -- I
18 can't exactly remember what she said, but she didn't
19 -- she wanted me to go to the African-American
20 round-table.

21 And she was getting mad with me that I
22 wanted to not go to the African-American round
23 -table, and I told her during our conversation that I
24 didn't want to be pigeonholed. And I asked her,
25 "Why do I always have to go?"

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1 And she said, "Well, you are pigeonholed,
2 so just deal with it."

3 And that really got my attention. I
4 asked her, "Why am I pigeonholed"?

5 And I looked for Terry, but I didn't see
6 Terry --

7 Q I didn't ask anything about Terry,
8 ma'am. I asked you what you said to Ms. Sheppard.

9 A Well, I've told you everything that I can
10 remember as I sit here.

11 Q Fine. Now, did you speak to anybody
12 prior to speaking to Ms. Sheppard?

13 A I don't believe so.

14 Q Okay. So you spoke to Mr. Kester and
15 Mr. Becker after you spoke to Ms. Sheppard. Is that
16 correct?

17 A I spoke to Becker then Kester.

18 Q All right.

19 (Exhibit 28 marked for identification.)

20 Q I'm going to hand you what's been marked
21 for purposes of identification as Defendant's
22 Exhibit 28. Do you recognize that document, ma'am?

23 A Yes.

24 Q And is that an e-mail that contains an
25 attachment that is the assignments for the RPOF

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1 staff at the annual meeting?

2 A It doesn't look familiar.

3 Q Do you dispute that it is the assignments
4 for the RPOF staff annual meeting?

5 A I remember getting something for the
6 annual meeting. I just don't remember it being this
7 long or in this form.

8 Q Do you dispute whether this is the
9 assignments for the RPOF staff that you received on
10 Monday, January 19 from Terry Kester?

11 A Can you repeat the question, please?

12 Q What don't you understand?

13 A The part about this being from Terry
14 Kester, because it's not from Terry Kester.

15 Q Did you receive this e-mail from Terry
16 Kester with the assignments for the RPOF staff on
17 Monday, January 19, 2004?

18 A It's possible.

19 Q So you don't --

20 A I don't recognize it.

21 Q You don't remember one way or the other?

22 A That's not what I said. I mean --

23 Q Do you --

24 A Let me answer the question. And when I'm
25 finished, I will let you know.

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1 Q Thank you.

2 A This -- the top of this e-mail says,
3 "Robert Neaves," and it doesn't say, "Terry Kester,"
4 who the e-mail says it's from. So I'm -- I'm
5 wondering what this is. What -- I'm -- I mean, I
6 receive a lot of -- I receive a lot of e-mails from
7 a lot of people.

8 I told you, you know, I got -- this
9 format is the format that Terry would send out every
10 week for our weekly conference call, our RPOF
11 conference call, but the document doesn't look
12 familiar. Now, not to say that this isn't the
13 document, but I can't recall from memory if this is
14 the one he sent.

15 Q So you don't know one way or the other.
16 Is that right?

17 A I didn't say that.

18 Q Well, then I don't understand what you're
19 saying. You either remember it or you don't
20 remember it.

21 A Well, I mean, I'm trying to remember if I
22 know somebody named Robert Neaves so I can remember
23 when I might have gotten this e-mail, if I can
24 remember something more about it, but I don't even
25 know who the heck that is.

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1 MR. ISLER: We'll stipulate on the
2 record that the name of the person -- of
3 anybody who's ever printed out an e-mail in a
4 Microsoft Outlook format knows that the name
5 of the person above the line to the left is
6 simply the name of the person who printed out
7 that particular e-mail.

8 In other words, it was printed off of
9 that computer, and it may or may not have
10 anything to do with the content of the message
11 which is set forth in the body of the message
12 beginning with the word, "From." So with that
13 stipulation, can we continue the questions,
14 please?

15 BY MR. McKENNA:

16 Q Do you remember whether or not you got
17 this e-mail and this attachment?

18 A No, Mr. McKenna. I -- I got an e-mail
19 with the assignments on it, but I don't remember if
20 this is the one.

21 Q All right. Do you dispute that this may
22 have been the e-mail and the assignments that you
23 got from Terry Kester on Monday, January 19, 2004?

24 MR. THOMPSON: Object to the form.

25 A I can't agree or dispute.

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1 Q Okay. Now, if you turn to the
2 assignments, it indicates on Friday, January 23, you
3 were on the registration desk from 9 a.m. -- I'm
4 sorry -- from 2 p.m. to 5 p.m. Do you see that,
5 ma'am?

6 A Yes. That's not accurate.

7 Q Okay. Then if you turn to the next page,
8 it indicates, The African-American round-table was
9 from 1 p.m. to 2 p.m. Do you see that, ma'am?

10 A Yes.

11 Q Was that accurate?

12 A Yes. The African-American round-table
13 was from then to then.

14 Q Was from one to two?

15 A Yes, sir.

16 Q All right. So how long prior to the
17 African-American round-table did you speak to
18 Ms. Sheppard?

19 A Well, I was actually -- I didn't work --
20 well, I worked it pretty much all day, but I started
21 working the registration table around nine, and then
22 I left the registration table to go to the
23 African-American round-table. And then after the
24 African-American round-table I went back to the
25 registration table. So it was sometime before one

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1 o'clock.

2 Q Okay. Closer to one o'clock or closer to
3 nine o'clock?

4 A Closer to one o'clock.

5 Q All right. Do you know -- after looking
6 at this, does this help refresh your recollection as
7 to whether it was after lunch or not that you spoke
8 to Ms. Sheppard?

9 A It was at some point before lunch --
10 before one o'clock, and I don't know if it was
11 before or after. I'm assuming when you say "lunch,"
12 you mean noontime. I mean, I can't -- I can't give
13 you any more than I have. I'm sorry.

14 Q Okay.

15 A And I'm trying. I'm really trying.

16 Q So on Monday, January 19, 2004, you knew
17 what your assignments were at the annual meeting.
18 Is that correct?

19 A Can you repeat that, please?

20 Q On Monday, January 19, 2004, you knew
21 what your assignment was going to be at the annual
22 meeting. Correct?

23 A I don't -- okay. I've really got to
24 stop. I really can't -- I can't focus. I can't
25 hold a thought in my head, and this is getting hard

1 for me now, so --

2 Q You can't answer the pending question?

3 A What's your question?

4 MR. THOMPSON: I don't think she's
5 understanding the pending question.

6 MR. McKENNA: That on Monday, January --

7 MR. THOMPSON: That's part of the
8 problem here.

9 MR. McKENNA: -- 19, 2004, she knew what
10 her assignments were going to be at the annual
11 meeting. That's a very simple question.

12 MR. THOMPSON: It's not that simple.

13 THE WITNESS: Yes and no. Well --

14 MR. ISLER: Let her finish. Go ahead.

15 A Your sound effects, Mr. McKenna, are
16 killing me. Yes and no. They would come out with
17 these -- for instance, like right here it says I'm
18 supposed to be at the registration table from two to
19 five. Well, these -- some of these times are not
20 tentative -- I mean, they're tentative. They're not
21 what it's actually going to be.

22 I mean, this isn't -- this isn't really
23 -- this is more tentative than anything. And what I
24 remember getting -- something that was like one-page
25 long is what I remember. And, I mean, I knew I was

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1 going to be at the registration desk and other
2 stuff, but I don't remember this big, long thing.

3 Q You knew you were going to be at the
4 African-American round-table. Right?

5 A What was your question again?

6 Q And you knew you were going to be at the
7 African-American round-table?

8 A I didn't want to go to the
9 African-American round-table.

10 Q That wasn't the question. But you knew
11 on January 19, 2004, that you were scheduled to go,
12 didn't you?

13 A No, I didn't know that I was scheduled to
14 go to the African-American round-table. I don't --
15 I don't remember that. I told you I don't
16 remember --

17 MR. ISLER: Why don't we take a brief
18 break. Why don't you take your client out and
19 give her a brief break from this and walk
20 around. And let's try to keep on going, but
21 she can take breaks every half hour, if she
22 needs to, to clear her head.

23 MR. THOMPSON: If she's starting to get
24 into the fog, it's going to be on that caveat.

25 MR. ISLER: She's not getting into a

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1 fog, as best I can tell.

2 MR. THOMPSON: Well, okay.

3 Mr. ISLER: She's frustrated because she
4 and Ed are not communicating well together.

5 And if she needs to take a break to clear her
6 head, then that's fine. But if she tells you

7 that she is medically impaired, then that's

8 fine, we will take that up. You guys can go

9 have that conversation, and you can come back

10 and let us know whether --

11 MR. THOMPSON: I understand you don't

12 think -- you believe you know what's in her

13 head. I'll talk to her about it.

14 MR. ISLER: That would be fine. We're

15 off the record.

16 (Recess from 2:33 to 2:45 p.m.)

17 MR. THOMPSON: It's my client's

18 understanding the Lamaticol that she takes in

19 the morning is what -- that medication is to

20 keep her coherent, but it's a morning

21 medication. I don't know whether it's running

22 its course at this point. But she has

23 indicated to me that she's starting to get in

24 that haze that she was in before, so her answer

25 to whether she can accurately -- I mean,

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1 truthfully no problem, but accurately might
2 be --

3 MR. McKENNA: And completely.

4 MR. THOMPSON: -- and completely might
5 be an issue at that point. It's something we
6 all discussed at the onset of this, and I
7 don't know what to say except if you want to
8 take her doctor's deposition and find out
9 whether there's any validity to it, you know,
10 that's great.

11 I would suggest that if we continue it,
12 we continue it in conjunction with another
13 depo that's down here, so that way you don't
14 have to make another trip. I would hate to
15 have you make another trip.

16 MR. ISLER: I appreciate it. Do we have
17 any other depositions scheduled for Tampa
18 yet?

19 MR. McKENNA: Not yet.

20 MR. ISLER: Isn't most everybody else in
21 Tallahassee?

22 MR. McKENNA: Uh-huh, the ones we've
23 been talking about.

24 MR. ISLER: Is there anyone else down
25 here that we're going to be deposing in this

1 matter?

2 THE WITNESS: My doctor.

3 MR. THOMPSON: Her doctor. You guys
4 indicated that you want to take that
5 deposition?

6 MR. McKENNA: May be some other ones I
7 want to take, but I haven't really got that
8 far yet.

9 MR. THOMPSON: So that's certainly one
10 right there that I'm sure that you're going to
11 want to take.

12 MR. ISLER: Is it possible for your
13 client to call and to ask whether she can
14 switch her days off from Wednesday to Tuesday
15 and just flip-flop the next two days, because
16 she indicated that she had Wednesday off, I
17 believe. Is that correct?

18 THE WITNESS: No.

19 MR. ISLER: You said Wednesday was no
20 problem?

21 MR. THOMPSON: No. She said she would
22 be able to take Wednesday. She could probably
23 get Wednesday is what you said. Right?

24 THE WITNESS: Wednesday is my day off,
25 but, no, I'm not going to ask for it. I

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1 just --

2 MR. THOMPSON: It's too -- she just got
3 this job again. The last -- I'm not going to
4 have her lose her job. I do want to try to
5 make it so you don't have to make a special
6 flight down, you know, and that's what I'll --
7 I'll certainly do my best to work on that,
8 Eddie. I don't know --

9 MR. McKENNA: We don't have to do this
10 on the record.

11 MR. THOMPSON: Okay. Yeah. Let's go
12 off the record for this.

13 MR. McKENNA: Wait a minute. You said
14 that she can't -- she does not feel she can go
15 forward medically?

16 MR. THOMPSON: Yes.

17 MR. McKENNA: So we don't have a choice
18 at that point.

19 MR. THOMPSON: Yes.

20 (At 2:48 p.m., the deposition was
21 adjourned.)

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