

1 Q. Sure.

2 A. It was probably through a solicitation.

3 MS. BOYD: This is the second
4 exhibit, bid from Wright Cleaning Services.

5 (The document referred to was
6 marked by the CSR as Exhibit 2
7 for identification and made a
8 part of this deposition.)

9 BY MS. BOYD:

10 Q. Would it surprise you to know 520 North La
11 Brea Avenue, Suite 109, in Inglewood, is where this
12 is listed?

13 MS. GRANGER: Objection. Calls for
14 speculation.

15 BY MS. BOYD:

16 Q. I am asking you, would it surprise you to
17 know that?

18 A. Yes.

19 Q. You have chosen not to defend yourself in
20 this lawsuit; is that correct?

21 MS. GRANGER: Objection. Lacks
22 foundation.

23 THE WITNESS: No, that's not correct.

24 BY MS. BOYD:

25 Q. You have defended yourself in this lawsuit

1 against this lawsuit?

2 MS. GRANGER: Same objection.

3 THE WITNESS: Again, that's not
4 correct.

5 BY MS. BOYD:

6 Q. Did you ever respond to the lawsuit in any
7 way? Did you answer the complaint?

8 A. I don't recall.

9 Q. You don't recall whether you answered the
10 complaint or not?

11 A. No.

12 Q. No, you don't recall?

13 A. No, I don't recall.

14 Q. You don't recall whether you answered the
15 complaint?

16 Do you know "this complaint," what I'm
17 referring to in this case?

18 A. I'm confused. You said this deposition
19 was about the disposition of the personal property
20 inside the property, so I have to assume -- it
21 seemed like the lawsuit was more inclusive than
22 that, that you served, but this deposition you set
23 the parameters as to the deposition of the personal
24 property, so I'm a bit confused as to what you are
25 referring to. Are you referring to the extent of

1 the entire lawsuit, or are you referring to the
2 parameters of the deposition?

3 Q. I am referring to the lawsuit, any aspect
4 of it. Have you filed anything in response to the
5 complaint?

6 A. I thought the lawsuit was frivolous, and
7 it is.

8 To my understanding, I am no longer a part
9 of the lawsuit.

10 MS. GRANGER: You can use this
11 deposition however you want. You know this is
12 limited, and Mr. Alston is dismissed as a defendant
13 in this lawsuit, but it is your privilege.

14 MS. BOYD: I am asking him -- I
15 wouldn't want to confirm he has never filed
16 responses to his answer to the complaint at all,
17 frivolous or otherwise.

18 THE WITNESS: I don't recall spending
19 any money to defend myself for this lawsuit.

20 BY MS. BOYD:

21 Q. Do you recall responding to it at all
22 without spending any money?

23 A. I have responded to inquiries from you. I
24 have responded to inquiries from Citi's lawyers as
25 well.

1 Q. But you have not filed anything to the
2 court in response?

3 A. You are asking the same question over and
4 over.

5 Q. Before the Ocean Park property have you
6 ever handled a REO foreclosure eviction?

7 A. Yes.

8 Q. You had. A few times?

9 A. Yes.

10 Q. Many times?

11 A. A few.

12 Q. A few?

13 A. From the -- a few.

14 Q. With an institutional client or owner of
15 the property?

16 A. A few.

17 Q. Okay. Have you ever dealt with an
18 eviction or foreclosure and eviction where there was
19 personal property left behind?

20 A. Yes.

21 Q. Was this property disposed of retrieved?
22 Stored? Do you have any recollection, I guess, as
23 to whether or not you ever handled it any different
24 way than you handled it in this case?

25 MS. GRANGER: Before this?