

1 A. No.

2 Q. I want to try to talk slowly enough and  
3 get through my questions before you answer so that  
4 the court reporter can get everything down, and she  
5 will let us know if there are any names that she  
6 needs us to spell. As we go through this, if there  
7 is something where I am asking for an estimate for a  
8 question, I will let you know that. Otherwise, if  
9 there is a question that you don't know the answer,  
10 you can let me know.

11 A. Yes.

12 Q. The question regarding the trash-out of  
13 the personal property that was left, was it all your  
14 fault?

15 MS. GRANGER: Objection.

16 THE WITNESS: I don't understand the  
17 question.

18 BY MS. BOYD:

19 Q. Do you believe you are responsible for  
20 sending out the notice?

21 MS. GRANGER: Objection.

22 MS. BOYD: Are you representing the  
23 client?

24 MS. GRANGER: I am objecting to the  
25 form of that question. It is vague, calling for

1 speculation and an expert opinion.

2 MS. BOYD: I was asking him for his  
3 personal opinion.

4 BY MS. BOYD:

5 Q. Do you believe that you should have sent  
6 out a notice, any kind of notice, in the mail or  
7 made a phone call regarding the personal property  
8 before you threw it away?

9 MS. GRANGER: Objection. Lacks  
10 foundation.

11 You can answer the questions even  
12 though I object.

13 THE WITNESS: I don't understand the  
14 question. It is complicated.

15 BY MS. BOYD:

16 Q. Were you instructed to throw the property  
17 away?

18 MS. GRANGER: Objection. Lacks  
19 foundation.

20 THE WITNESS: No, I was not.

21 BY MS. BOYD:

22 Q. You can go ahead and answer.

23 A. The question, again, calls for a  
24 conclusion of what happened to the property. It  
25 didn't just happen that way.

1 BY MS. BOYD:

2 Q. Okay. Do you want to explain to me in  
3 your own words how it happened?

4 MS. GRANGER: What property are you  
5 talking about?

6 BY MS. BOYD:

7 Q. The property being thrown away. We are  
8 still talking about the property being thrown away.  
9 Are you talking about the property being thrown  
10 away? I am giving you the opportunity in your own  
11 words, whether it was your own fault and decision to  
12 throw it away. So I am giving you the opportunity  
13 to explain in your own words how it happened.

14 A. This was a completely different statement  
15 as to what the original question was. You never  
16 asked whether it was the decision to dispose of the  
17 personal property. It was an independent decision  
18 that I made. Now you are characterizing it that  
19 way. This is a different question.

20 Q. I am going to give you an opportunity to  
21 explain to me in your own words, including whether  
22 it was an independent decision, so I am giving you  
23 the opportunity to explain in your own words. I  
24 understand that's a different question. Do you want  
25 to explain how it happened?