

Transcript of the Testimony of

Sonya Eveld

Date: February 26, 2015

Case: City of Ozark v. Union Pacific Railroad Company

Bushman Court Reporting

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EXHIBIT

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Page 1 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF ARKANSAS FORT SMITH DIVISION CITY OF OZARK, a Municipal Corporation PLAINTIFF VS. CASE ACTION NO. 2:14-CV-02196-TLB UNION PACIFIC RAILROAD COMPANY ARKANSAS STATE HIGHWAY COMMISSION, as Governing Body of the ARKANSAS STATE HIGHWAY AND TRANSPORTATION DEPARTMENT, DEFENDANTS VIDEOTAPED DEPOSITION OF SONYA EVELD February 26, 2015 BUSHMAN COURT REPORTING 620 West Third, Suite 302 Little Rock, Arkansas 72201 501.372.5115	Page 3 I N D E X 1 2 3 EXAMINATION 4 By Ms. Jones 6 5 EXAMINATION 6 By Mr. Brockett. 21 7 8 E X H I B I T S 9 10 Exhibit No. 147 (Affidavit) 7 11 Exhibit No. 148 (File). 13 12 Exhibit No. 149 (Flash Drive) 13 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 2 1 A P P E A R A N C E S 2 3 ON BEHALF OF THE PLAINTIFF: 4 CHRISTOPHER D. BROCKETT, ESQ. 5 Sayre & Brockett 6 401 West Commercial Street 7 Ozark, Arkansas 72949 8 9 ON BEHALF OF THE DEFENDANTS: 10 JAMIE JONES, ESQ. 11 Friday, Eldredge & Clark 12 400 West Capitol 13 Suite 2000 14 Little Rock, Arkansas 72201 15 16 also present: Bob Dunn 17 18 19 20 21 22 23 24 25	Page 4 1 ANSWERS AND DEPOSITION OF SONYA EVELD, a 2 witness produced at the request of the Defendants, 3 was taken in the above-styled and numbered cause on 4 the 26th day of February, 2015, before Janess 5 Ferguson Smith, Certified Court Reporter and Notary 6 Public in and for Saline County, Arkansas, at the 7 Offices of Sayre & Brockett, 401 West Commercial 8 Street, Ozark, Arkansas, at 9:46 a.m. 9 10 11 * * * * * 12 13 S T I P U L A T I O N S 14 It is stipulated and agreed by and between 15 the parties through their respective counsel that the 16 deposition of SONYA EVELD may be taken for any and 17 all purposes according to the Federal Rules of Civil 18 Procedure. 19 * * * * * 20 21 22 23 24 25

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1 THE VIDEOGRAPHER: We are on the audio 2 and video record. Today's date is 3 February 26th, 2015. The approximate time 4 is 9:46 a.m. 5 This is the video-recorded deposition 6 of Ms. Sonya Eveld. This deposition is 7 being taken at 401 West Commercial Street, 8 Ozark, Arkansas. 9 Would the attorneys please make a 10 record of their appearance. 11 MR. BROCKETT: Christopher Brockett 12 for the Plaintiff. 13 MS. JONES: Jamie Jones on behalf 14 Union Pacific Railroad Company. 15 THE VIDEOGRAPHER: Would the reporter 16 please swear the witness? 17 SONYA EVELD, 18 the witness hereinbefore named, having first been 19 duly cautioned and sworn or affirmed to tell the 20 truth, the whole truth and nothing but the truth, 21 testified as follows: 22 MR. BROCKETT: And, Jamie, same 23 stipulations, deposition by agreement of 24 the parties. All objections are reserved 25 except to the form of the question and	1 A. It's an elected position. 2 Q. Okay. When did you run for that position? 3 A. Two thousand -- I was elected and took office 4 in 2011, January 1st, 2011. 5 Q. Was this your first time involved in Ozark 6 politics? 7 A. Yes. 8 Q. Okay. And is the city clerk a full-time job? 9 A. Yes. 10 Q. Okay. And what is your business address? 11 A. 2910 West Commercial, Ozark. 12 Q. And what is your home address? 13 A. 405 North 24th, Ozark. 14 Q. And what is your phone number? 15 A. (479)667-1920. 16 Q. Okay. You're not going to be testifying as to 17 the use of the crossing that's at issue in this 18 lawsuit; are you? 19 A. No. 20 Q. Okay. And you're not going to be testifying 21 about a street called Oliver; are you? 22 A. No. 23 (Exhibit No. 147 was marked.) 24 BY MS. JONES: 25 Q. Okay. I guess the exception being I'm going to
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1 responsiveness of the answer. 2 MS. JONES: Agreed. 3 EXAMINATION 4 BY MS. JONES: 5 Q. Ms. Eveld, my name is Jamie Jones. I represent 6 Union Pacific Railroad Company in the city's action 7 against it. 8 I understand that you are really just going 9 to be a custodian of records witness; is that 10 correct? 11 A. Yes, that's correct. 12 Q. Okay. You do not have any knowledge about the 13 crossing at issue; is that correct? 14 A. No. I don't, no. 15 Q. When did you move to Ozark? 16 A. In 2002. Well, I lived here in 1979 and lived 17 here for probably 15 years, but then I moved to Van 18 Buren, and then when I married my husband I moved 19 back. 20 Q. Okay. When is your date of birth? 21 A. 2-10-62. 22 Q. Okay. So that makes you how old today? 23 A. Fifty-three. 24 Q. Okay. And how did you become city clerk? It's 25 an elected position?	1 hand you what I have marked as Exhibit 147. I want 2 to ask you about that. 3 MS. JONES: Christopher, that's that 4 affidavit that was attached. 5 MR. BROCKETT: Okay. 6 BY MS. JONES: 7 Q. Do you recall doing this affidavit? 8 A. (Witness reviews document.) Yes. 9 Q. Okay. Number three, it says, I was asked to 10 review the minutes and ordinances from 1999 through 11 2001. 12 Who asked you to review the minutes? 13 A. Let me think about that. It may have been the 14 former mayor, Carol Sneath. 15 Q. Okay. 16 A. I don't even remember who that was that asked 17 me to review those. 18 Q. And what did you do in order to make this 19 affidavit? What did you review? What did you 20 research? 21 A. Well, I have scanned in all of the former 22 ordinances, resolutions, that type of thing, in a 23 program called Laserfiche, and I did a search in 24 Laserfiche on anything with the key words "Oliver 25 Street."

2 (Pages 5 to 8)

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1 Q. Okay. Did you use any other words to search 2 except for "Oliver Street"? 3 A. Let me think, because I thought about that, 4 too. I did do a search on Union Pacific to see if 5 there was anything in relation to Union Pacific, but 6 I only collected here what had to do with Oliver 7 Street. 8 Q. Okay. So in order to make this affidavit you 9 searched your program for the key word "Oliver 10 Street"? 11 A. Yes. 12 Q. Okay. You didn't look for "crossing"? 13 A. I did not. 14 Q. Did you look for "quiet zone"? 15 A. No. 16 Q. Did you look for "horn"? 17 A. No. 18 Q. Okay. Nothing but "Oliver Street"? 19 A. Correct. 20 Q. Okay. And so based on that search it's what 21 you base your paragraph four on; correct? 22 A. Yes. 23 Q. Okay. You were not there in 2001, 2002? 24 A. No, ma'am. 25 Q. Okay. So if they -- if the council members	1 things like, A vote was had, or someone motioned, and 2 they don't -- they may say a reading occurred, but 3 they don't recite what the reading was; correct? 4 A. That's true. 5 Q. So unless you were there, you may not even 6 know -- 7 A. That's true. 8 Q. -- what the vote is referring to; correct? 9 A. That's right. I try to -- in my office I try 10 to make more reference to what we are voting on and 11 like, for example, what the title of the ordinance 12 would be, because I have seen old minutes where they 13 did not reflect. 14 Q. And, in fact, 2001-2002 oftentimes there is no 15 notation of what the vote was or the title of the 16 vote? 17 A. That's true. Uh-huh. 18 Q. Okay. 19 A. I have seen that. 20 Q. All right. You don't have any knowledge and 21 are not going to testify about anything about Main 22 Street Ozark; correct? 23 A. No. 24 Q. You don't have any knowledge or not going to 25 testify about any of the plans of the city with a
Page 10	Page 12
1 have testified that there was indeed a discussion, 2 you don't know anything about that; correct? 3 A. Correct. 4 Q. And -- 5 A. Unless it was in the minutes, which, I mean, I 6 could look at the minutes, but that's it. 7 Q. Okay. 8 A. Now, as far as discussion outside of minutes, 9 no, I wouldn't know. 10 Q. Okay. And, and I have read through the 11 minutes, and I'm assuming you have at least looked 12 through some of the minutes? 13 A. Yes. 14 Q. Can you agree that sometimes the minutes don't 15 state what is being discussed? 16 A. That's true. It's an overview. 17 Q. Okay. So there could be discussions that occur 18 that don't make it into the minutes? 19 A. That's true. 20 Q. And there could be discussions that occur that 21 might be put in the minutes in a way you can't really 22 see what the discussion was, correct, unless you were 23 there? 24 A. That's possible, yes. 25 Q. And sometimes there's votes that just say	1 biking or hiking trail; correct? 2 A. I have no knowledge. 3 Q. Okay. Or what their plans would be if this 4 crossing was reinstalled; correct? 5 A. Correct. 6 Q. Okay. And you don't have any knowledge about 7 whether or not the council authorized Mayor Timmerman 8 to ask the railroad to take out their crossing? 9 A. I do not. 10 Q. Okay. And so your, your testimony if you 11 testify at trial will be limited to looking at a city 12 record and saying that you're custodian of record; 13 correct? 14 A. That's correct. 15 MS. JONES: Okay. I think that's all 16 I have. 17 MR. BROCKETT: Okay. You brought 18 paperwork today? 19 THE WITNESS: I brought the things 20 that I printed off based on my search, and 21 if there was anything missed, I actually 22 caught -- any, anything to do with the 23 railroad, and I brought a flash drive that 24 contains all of the minutes, not just what 25 pertains to it, all of the minutes and all

3 (Pages 9 to 12)

Page 13 1 of the voice recordings. 2 MR. BROCKETT: Okay. All right. I 3 will make you a copy of everything. 4 MS. JONES: Okay. I guess can we go 5 back over to me, and I will just mark 6 everything. 7 MR. BROCKETT: Yeah, that's fine. 8 BY MS. JONES: 9 Q. Yeah. Okay. Let me see what you have. I 10 didn't even notice you had that sitting there. So, 11 okay, I'm going to go ahead and mark your file as 12 Exhibit 148, and I am going to mark the flash drive 13 as 149. We are getting really multimedia here. 14 (Exhibit Nos. 148 and 149 were marked.) 15 BY MS. JONES: 16 Q. And it looks like you have got the subpoena for 17 you to testify, and these are the documents that 18 would be responsive to the subpoena; correct? 19 A. Yes. 20 Q. So it looks like it's the city's 30(b)(6) 21 disclosures? 22 A. Oh, that's nothing. That's a bill. 23 Q. Okay. 24 A. I just had it with my other stuff. 25 Q. Okay. Okay. So we have the engagement and fee	Page 15 1 A. Uh-huh. 2 Q. I'm sorry. Is that "yes"? 3 A. Yes. 4 Q. I didn't go through with all of you -- 5 A. That's fine. 6 Q. -- she is taking down everything that we say, 7 so I have to get yes-or-no questions. And so it 8 looks like these are the 2014 minutes that you have 9 done, and 2013; is that correct? 10 A. Yes. 11 Q. Okay. And it looks like there is a few, at 12 least one 2012 and one 2011. Is this just the 13 minutes in which something to do with this lawsuit 14 was discussed? 15 A. Yes. 16 Q. Okay. Okay. So tell me what's on the flash 17 drive, which is Exhibit 149? 18 A. It contains all minutes from 2011 forward, all 19 audio recordings, council packet information, that 20 type of thing, so in case I forgot something or 21 missed something. 22 Q. What about the audio recordings for 2001, 2002, 23 where are they? 24 A. They are on cassette. It used to be done on 25 old cassettes, and they are in storage at City Hall.
Page 14 1 agreement signed -- it's not signed. It's an 2 unsigned copy. Do we have a signed copy of this? 3 A. I am sure there is one at the City Hall. 4 MR. BROCKETT: I hope so. 5 BY MS. JONES: 6 Q. Okay. Then it looks like there's an email from 7 Mr. Brockett to the council for Mr., about Mr. Soliz 8 (phonetic)? 9 A. Some of those didn't print very well. They 10 kind of printed funny off of my Laserfiche program. 11 Q. Okay. Okay. So I think this looks to be the 12 letter that I received early on in this case from 13 Mr. Brockett. Who is Connie Las Schneider? 14 A. She is a reporter for the Ozark Spectator. 15 Q. Okay. And why is she having you review her 16 stories? 17 A. She always does that. Every time she takes the 18 information down for the report in the paper she 19 always asks for someone to verify it. 20 Q. Okay. And do you verify -- I guess, then, do 21 you tell her -- are you looking at to say the subject 22 matter is okay, or are you telling her that it's -- 23 A. Spelling, that type of thing. 24 Q. Okay. And reflects what happened at the 25 meeting?	Page 16 1 Q. Okay. Is that something that we can get access 2 to? 3 A. I would think that you could get a copy of them 4 provided, if they even still work. I don't even 5 know. But I have an old recorder/player there and 6 the cassettes, but, honestly, I have not listened to 7 those old ones, so. 8 Q. Has anyone asked you to go through and -- 9 there's been some testimony in this case about a 10 discussion that was had and potentially a vote that 11 was had regarding the closing of the crossing in 12 2001, 2002. Has anyone asked you to go back and 13 listen to any of those audios? 14 A. No. 15 Q. Okay. All right. So there is -- somewhere at 16 City Hall there is a room -- 17 A. Yes. 18 Q. -- that has cassette tapes from that time 19 period? 20 A. Yes. 21 Q. Okay. And how are the -- do, do we have the 22 agendas from 2000 through 2002? 23 A. Since I took office I scan all of that in with 24 my council meetings, but I don't -- I mean, there 25 should be one at City Hall somewhere.

4 (Pages 13 to 16)

Page 17 1 I don't know how former city clerks did 2 that, as far as retaining records. I know we are 3 required to keep all ordinances, resolutions, that 4 type of thing, and minutes, but I don't know that 5 they kept the agendas. I don't know. 6 Q. Okay. What about -- so somewhere can we 7 identify every ordinance or resolution or piece of 8 paper that was voted on in 2000 through 2002? Is 9 there a way to do that? 10 A. Only if it was in the documents that were 11 scanned in. 12 Q. Okay. So do you have what was scanned in for 13 that time period? 14 A. Yes. 15 Q. Can you get those to me? 16 A. And what, what -- 17 Q. From 2000 through 2002. 18 A. That says anything about what? 19 Q. No, I want them all. 20 A. Oh, okay. Yes, ma'am. 21 Q. Okay. 22 A. I can. I don't know what format they will be 23 in as far as -- you notice how some of those printed 24 funny? 25 Q. Yeah, uh-huh.	Page 19 1 the agendas, and any ordinances or resolutions that 2 are passed. What other types of records would you 3 anticipate being kept? 4 A. Overall? 5 Q. Yes, ma'am. 6 A. Anything that was done as far as grant monies 7 or administration of a grant. That would have been 8 saved from that timeframe. 9 The, the cassettes should be in there. 10 That's really all I can think of as far as records, 11 maybe -- of course, all of our backup for money spent 12 or all of the payroll records. 13 Q. Okay. 14 MS. JONES: I'd like to get a copy of 15 the cassette recordings. Can maybe I work 16 with maybe getting like Modus to come down 17 and get copies of those or something; would 18 that be okay? 19 MR. BROCKETT: Yeah. 20 MS. JONES: I mean, I don't want to 21 take your originals, so maybe we could get 22 Modus to copy them for us. 23 MR. BROCKETT: That would be fine. 24 BY MS. JONES: 25 Q. Okay. What about the mayor's files, let's talk
Page 18 1 A. Or what program it would take for you to open 2 them. I think they are TS files -- 3 Q. Okay. 4 A. -- or a pdf maybe. 5 Q. Okay. 6 A. But I can send them to you. If -- some of them 7 if they are too large they don't go on my server, you 8 sent me, or somebody sent me some kind of a Hightail, 9 if you could get me something like that, too, in case 10 they are too large. 11 Q. Absolutely. 12 A. Yes. 13 Q. Yeah, I can get that to Mr. Brockett and get 14 you a Hightail password. Okay. And, in fact, I mean 15 I can get you discs. 16 A. Sure. 17 Q. Or a flash drive or something like that. 18 A. Yeah, a flash drive would be great. 19 Q. Okay. I could just get you a flash drive, and 20 you can put it all on flash drive for me. 21 A. Yeah, that would be great. 22 Q. Okay. Is there any other types of records that 23 you would expect to have been kept from 2000 through 24 2002? 25 I mean, we've got minutes, the recordings,	Page 20 1 about Mayor Timmerman. Do you have any knowledge of 2 how he would have maintained files that came through 3 his office? 4 A. I do not. 5 Q. Okay. So to the city clerk, would he have -- 6 okay, there's been talk about he read a letter. If 7 there was a letter that he had, do you know if he 8 would have given it to the clerk to keep and maintain 9 a copy or -- 10 A. I have no idea. 11 Q. Okay. All right. How are the current mayor's 12 files kept, to your knowledge? 13 A. The current mayor generally gives me a copy of 14 what he, you know, needs presented to the council or 15 that type of thing. 16 Q. Okay. 17 A. I don't know what he does with his records, but 18 I know what he gives me. 19 Q. Okay. Would you have anticipated back in 2000 20 through 2002 that Mayor Timmerman would have given a 21 copy to the clerk of things that were discussed at 22 meetings? 23 A. I would, I would hope so. 24 Q. Okay. So if he did it should be reflected 25 somewhere in the files?

5 (Pages 17 to 20)

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1 A. Yes. 2 Q. That you are going to look for for me; correct? 3 A. I would think. 4 Q. Okay. Has anyone asked to you to look for 5 anything from Mayor Timmerman's files? 6 A. No. 7 Q. Okay. 8 MS. JONES: All right. Thank you so 9 much. I appreciate your help. 10 THE WITNESS: You're welcome. 11 EXAMINATION 12 BY MR. BROCKETT: 13 Q. Have you heard any rumors regarding Mayor 14 Timmerman, how he may have left his files after he 15 left office? 16 A. No. 17 Q. Okay. Do you know if he ever shredded any 18 documents? 19 A. I have no knowledge of anything that happened 20 in his administration. 21 Q. Okay. Fair enough. And going along with our 22 agreement that you are going to look for this 23 information, will you also run a search through your 24 program for the terms "horn, quiet zone, crossing"? 25 A. Will you email that to me?	1 COURT REPORTER'S CERTIFICATE 2 STATE OF ARKANSAS) 3)ss. 4 COUNTY OF SALINE) 5 I, JANESE FERGUSON SMITH, CCR, RPR, a 6 Notary Public in and for Saline County, Arkansas do 7 hereby certify that the facts stated by me in the 8 caption of the foregoing matter are true; and that 9 the foregoing matter was transcribed by me, to the 10 best of my ability and understanding, from my machine 11 shorthand notes taken at the time and place set out 12 in the caption hereto. 13 In accordance with Rule 30(e) of the 14 Rules of Civil Procedure, review of the transcript 15 was waived by the deponent or a party thereto. 16 I FURTHER CERTIFY that I am neither 17 counsel for, related to, nor employed by any of the 18 parties to the action in which this proceeding was 19 taken; and, further that I am not a relative or 20 employee of any attorney or counsel employed by the 21 parties hereto, not financially interested or 22 otherwise, in the outcome of this action. 23 GIVEN UNDER MY HAND AND SEAL OF OFFICE on 24 this, the 26th day of February, 2015. 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000
Page 22 1 Q. Absolutely, I will. 2 A. I will. 3 Q. If you'll run all of that and see if there -- 4 A. Sure. 5 Q. -- is anything? 6 A. And I may have a few others I will send you. 7 Q. Okay. If you've got some more, yeah, sure, 8 absolutely. 9 MR. BROCKETT: I think that's it. 10 MS. JONES: Thank you so much. 11 THE WITNESS: You're welcome. 12 THE VIDEOGRAPHER: This concludes the 13 deposition. We are off the record at 10:05 14 a.m. 15 (The deposition was concluded at 10:05 a.m.) 16 17 18 19 20 21 22 23 24 25	

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