

Page 1

1 UNITED STATES DISTRICT COURT
2 MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

4 LUKASZ GOTTWALD p/k/a DR. LUKE)
KASZ MONEY, INC., and)
5 PRESCRIPTION SONGS, LLC,,)
)

6 Plaintiffs,)
)

7 vs.)

No. 3:14-cv-2039

) Pages 1 - 172

8 PEBE SEBERT,)
)

9 Defendant.)
_____)

10
11
12
13
14
15 VOLUME I

16 VIDEOTAPED DEPOSITION OF CLINTON GIBBS

17 LOS ANGELES, CALIFORNIA

18 WEDNESDAY, JUNE 15, 2016
19
20
21

22 REPORTED BY:

LESLIE L. WHITE

23 CSR NO. 4148

JOB NO.: 108779
24
25

Page 2

Wednesday, June 15, 2016
12:34 p.m.

Videotaped deposition of CLINTON
GIBBS, Volume I, held at 11377 West Olympic
Boulevard, Los Angeles, California,
before Leslie L. White, CSR No. 4148.

Page 3

A P P E A R A N C E S:

MITCHELL, SILBERBERG & KNUPP
Attorneys for Plaintiffs
12 East 49th Street

New York, New York 10017
BY: JEFFREY MOVIT, ESQ. -AND-
CHRISTINE LEPERA, ESQ. -AND-
GABRIELLA NOURAFCHAN, ESQ.

BONE McALLESTER NORTON
Attorneys for Defendant Pebe Sebert
511 Union Street
Nashville, Tennessee 37219
BY: ALEX LITTLE, ESQ. -AND-
SUSAN DICKERSON, ESQ.

Page 4

A P P E A R A N C E S:

GIBSON, DUNN & CRUTCHER
Attorneys for Sony Music and Kemosabe
Records and the Witness
333 South Grand Avenue
Los Angeles, California 90071
BY: KATHERINE SMITH, ESQ.

ALSO PRESENT:
GREGORY GATELY, Videographer

Page 5

I N D E X

WITNESS:	EXAMINATION	PAGE
CLINTON GIBBS	BY MR. MOVIT	7
VOLUME I	BY MR. LITTLE	85

E X H I B I T S

PLAINTIFFS'	PAGE
Exhibit 1 Text messages	40

QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER

PAGE/LINE

93/200

95/19

102/5

159/8

168/9

INFORMATION REQUESTED

PAGE/LINE

162/18

REQUESTED TO BE MARKED
(NONE)

Page 6

1 LOS ANGELES, CALIFORNIA; MONDAY, JUNE 15, 2016
2 12:34 p.m.
3 -ooo-

4 THE VIDEOGRAPHER: Good afternoon, everyone.
5 We're on the record on June 15th, 2016. The time is
6 approximately 12:34 p.m.

7 This is the beginning of disc 1, Volume I,
8 in the deposition of Clinton Gibbs in the matter of
9 Lukasz Gottwald vs. Pebe Sebert.

10 This deposition is taking place at
11 Mitchell Silberberg & Knupp located at 11377 West
12 Olympic Boulevard, Suite 600, Los Angeles,
13 California 90064.

14 My name is Gregory Gateley. I'm the legal
15 video specialist. I'm here on behalf of TSG
16 Reporting. The court reporter today is Leslie White
17 also in association with TSG Reporting.

18 Counsel, please state your appearances for
19 the record.

20 MR. MOVIT: Good afternoon. My name is Jeff
21 Movit from Mitchell Silberberg & Knupp, counsel for
22 the plaintiffs in this action.

23 With me in the room is my co-counsel
24 Gabriella Nourafchan, and with us via video is
25 co-counsel Christine Lepera.

Page 7

1 MR. LITTLE: Alex Little on behalf of Pebe
2 Sebert.

3 MS. DICKERSON: Susan Neal Dickerson for Pebe
4 Sebert.

5 MS. SMITH: Katherine Smith of Gibson, Dunn on
6 behalf of third parties Kemosabe Records and Sony
7 Music Entertainment and on behalf of the witness.

8 THE VIDEOGRAPHER: And will the court reporter
9 please swear in the witness.

10
11 CLINTON GIBBS,
12 the witness herein, having been
13 first duly sworn, was examined
14 and testified as follows:

EXAMINATION

BY MR. MOVIT:

18 Q Good afternoon, Mr. Gibbs.

19 A Good afternoon.

20 Q Could you please state your full name for
21 the record.

22 A Clinton Gibbs.

23 Q Could you please spell that for the
24 record.

25 A C-l-i-n-t-o-n, G-i-b-b-s.

Page 8

1 Q Have you ever been deposed before?

2 A I have.

3 Q And when approximately were you deposed,
4 if you recall?

5 A If I recall, I think it was somewhere
6 2012-ish.

7 Q And do you know the nature of the
8 proceeding in which you were deposed?

9 A I do. I was in a car accident.

10 Q And were you a party to that case in which
11 you were deposed?

12 A Yes.

13 Q Were you a plaintiff or a defendant?

14 A I was the plaintiff.

15 Q You may have heard these rules before in
16 connection with that deposition, but I'll go over
17 them again.

18 Please -- I'm going to ask you questions.
19 Please wait to answer. An attorney in the room may
20 have an objection to the question. Please answer
21 questions with words and not with gestures because
22 the court reporter cannot record gestures, such as
23 shrugs or nods. So please answer with "yes" and
24 "no" instead of a shrug or a nod.

25 A Understood.

Page 9

1 Q Okay. Is there any -- do you have any
2 problems with your memory?

3 A No.

4 Q Is there any reason why you may need to
5 take a break at any time during the proceedings
6 today?

7 A Yes.

8 Q Okay. And what is that reason?

9 [REDACTED]

13 Q Sure. If at any time you need a break,
14 please just let us know.

15 A Thank you.

16 Q Mr. Gibbs, what is your current
17 occupation?

18 A Currently a chief recording engineer and
19 technical assistant for Kemosabe Records.

20 Q And how long have you had that job title?

21 A I believe about three years.

22 Q And did you previously have a different
23 job title at Kemosabe Records?

24 A Yes.

25 Q And what was that job title?

Page 10

1 A Assistant engineer, technical advisor.
 2 Q Okay. And when did you get the job as
 3 assistant engineer, technical advisor for Kemosabe
 4 Records?
 5 A January 2011 -- or excuse me. I need to
 6 clarify that. That was I think 2012 I started
 7 Kemosabe Records.
 8 Q Did you have any job at Kemosabe Records
 9 prior to that?
 10 A Yes.
 11 Q Okay. And what was that?
 12 A I worked for Kasz Money Productions.
 13 Q Is it your understanding Kasz Money is a
 14 different company than Kemosabe?
 15 A Yes.
 16 Q And what was your job title for Kemos- --
 17 for Kasz Money, excuse me?
 18 A Same as I start for Kemosabe, assistant
 19 engineer/technical advisor.
 20 Q And what period of time did you have that
 21 job as assistant engineer/technical advisor for Kasz
 22 Money?
 23 A January 2011 to 2012 sometime.
 24 Q And what was your job prior to this job as
 25 assistant engineer/technical advisor for Kasz Money?

Page 11

1 A Prior to that I worked at Conway Recording
 2 Studios as a runner and assistant engineer.
 3 Q And what period of time did you have that
 4 job at Conway Recording Studios?
 5 A From early 2008 to end of 2010.
 6 Q And what were your job duties at Conway?
 7 A Job duties at Conway, I would do runs for
 8 sessions, get them food, personal items, set up
 9 sessions, attend to artists and clients who were at
 10 the studio.
 11 Q And what was your job duty at Kasz Money?
 12 A Similar, but more involved on the
 13 recording side.
 14 Q And what was the involvement on the
 15 recording side?
 16 A Recording singers and musicians.
 17 Q And what were your job duties in
 18 your first position at Kemosabe Records?
 19 A The same as when I started with Kasz
 20 Money.
 21 Q And what are your current job duties at
 22 Kemosabe?
 23 A Very similar. Just more involved than I
 24 was before. Record more, just a few more
 25 responsibilities.

Page 12

1 Q Are you familiar with an individual named
 2 Luke Gottwald?
 3 A Yes.
 4 Q Do you know what Mr. Gottwald's
 5 professional name is?
 6 A Yes.
 7 Q What is his professional name?
 8 A Dr. Luke.
 9 Q And do you recall when you met
 10 approximately met Dr. Luke for the first time?
 11 A Yes, it was mid to late 2008.
 12 Q So you were working at Conway Studios at
 13 this time?
 14 A Yes.
 15 Q And do you recall where you met Dr. Luke
 16 when you met him for the first time?
 17 A Yes, at Conway Recording Studios.
 18 Q Do you recall why Dr. Luke was at Conway
 19 Studios the first time you met him?
 20 A Yes, he had a meeting with the artist
 21 Missy Elliott.
 22 Q During the time in which you were employed
 23 by Kasz Money, excuse me. Who -- strike that.
 24 Do you know who the head of Kasz Money is?
 25 A I'd have to speculate, but I think Lukasz

Page 13

1 Gottwald.
 2 Q Did you work with Dr. Luke directly during
 3 the time of your employment by Kasz Money?
 4 A Yes.
 5 Q Okay. How often did you directly interact
 6 with Dr. Luke during the time of your employment by
 7 Kasz Money?
 8 A About five to six days a week.
 9 Q How much time on an average day would you
 10 say you interacted with Dr. Luke during your time
 11 working at Kasz Money?
 12 A Anywhere from 10 to 12, 14 hours.
 13 Q A day?
 14 A A day.
 15 Q And during the time of your initial
 16 employment as assistant engineer at Kemosabe, did
 17 you work with Dr. Luke directly?
 18 A Yes.
 19 Q How often did you work with Dr. Luke
 20 directly?
 21 A The same, which I just stated.
 22 Q So five to six days a week?
 23 A Five to six days a week, yes, about 10 to
 24 12, 14 hours a day.
 25 Q And in connection with your current job at

Page 14

1 Kemosabe do you work with Dr. Luke directly?

2 A Yes.

3 Q How often do you work with Dr. Luke
4 directly?

5 A About five to six days a week, about 10,
6 12 to 14 hours a day.

7 Q During your time in which you were
8 employed by Kasz Money did you work with the
9 recording artists?

10 A Yes.

11 Q Could you tell me some of the recording
12 artists you worked with?

13 A I have worked with Jessie J, Katy Perry,
14 Kesha, Flo Rida, Pitbull. I can keep going if you'd
15 like.

16 Q That's fine.

17 During your time working for Kemosabe have
18 you worked with recording artists?

19 A Yes.

20 Q Okay. Could you name some of the
21 recording artists you have worked with.

22 A The same, plus more, if you'd like me to
23 list those.

24 Q That's fine.

25 Mr. Gibbs, are you familiar with an

Page 15

1 individual named Kesha Sebert?

2 A Yes.

3 Q Have you ever met Ms. Sebert?

4 A Yes.

5 Q Okay. Do you recall the first time you
6 met Ms. Sebert?

7 A Not the exact first time, but yes.

8 Q And when was that?

9 A Late 2008.

10 Q And do you recall where this was?

11 A At Conway Recording Studios.

12 Q Okay. And what were you doing at Conway
13 Recording Studios at that time?

14 A I was working as a runner and assistant
15 engineer.

16 Q And do you know what Ms. Sebert was doing
17 at Conway Studios at that time?

18 A Yes, I believe she was there as a
19 songwriter on a session.

20 Q Okay. Do you know what session?

21 A From my memory it may have been the Flo
22 Rida "Right Round" session. That's from my memory.

23 Q But you're not sure?

24 A Not a hundred percent.

25 Q Was Dr. Luke at the session?

Page 16

1 A Yes.

2 Q During this session did you interact at
3 all with Ms. Sebert?

4 A Only level of interaction I had with her
5 then was if she requested a coffee or to get her
6 some food, but no personal conversation.

7 Q During this session did you see
8 Mr. Gottwald interact with Ms. Sebert?

9 A Yes.

10 Q Could you describe their interactions.

11 A They seemed like friends, working
12 partners.

13 Just to clarify I wasn't in the recording
14 rooms with them during this time. I was working at
15 the studio. So most of the time I was in the
16 office, but people come out to common areas and hang
17 out and have lunch and dinner together, breaks.

18 I have seen them interact then. Seemed
19 very friendly.

20 Q Do you recall what Ms. Sebert's general
21 demeanor was like during this session?

22 A Yes.

23 Q And was that that demeanor?

24 A She seemed joyous, happy to be there, "kid
25 in a candy store" at a session, and just having a

Page 17

1 good time.

2 Q Do you recall the next time you saw
3 Ms. Sebert?

4 A Yes.

5 Q Okay. And when was that, if you recall?

6 A Sometime over the next few months into
7 2009.

8 Q And where was this?

9 A Conway Recording Studios.

10 Q Okay. And what were you doing there at
11 that time?

12 A I was working there as a runner and
13 assistant engineer.

14 Q Do you know what Ms. Sebert was doing
15 there at that time?

16 A Yes, I believe she was there working on
17 recording sessions.

18 Q Do you know what project the recording
19 sessions were for?

20 A Yes, I believe it was for her debut album
21 "Animal."

22 Q During these recording sessions did you
23 see Dr. Luke in attendance?

24 A Yes.

25 Q Okay. And do you recall how long these

Page 18

1 sessions went on for?

2 A Best of my memory, three weeks to a month,
3 to a month and a half, probably six days a week.

4 Q Do you recall who else was there at these
5 sessions besides Kesha and Dr. Luke?

6 A Yes.

7 Q Okay. Who else?

8 A Few that I remember: Producer Kojak,
9 producer Ammo, producer Benny Blanco, engineer Emily
10 Wright, Kesha was there. That's all I recall at the
11 moment.

12 Q Did you speak to Kesha at all during these
13 sessions?

14 A Yes.

15 Q Do you recall what you spoke to her about?

16 A I do not. Any interactions we had then
17 were -- she was the client, I worked there. Any
18 requests she had I attended to. Any talk would have
19 been friendly, small, hello and good-byes.

20 Q What was the general atmosphere like at
21 Conway during the recording sessions for "Animal"?

22 A The atmosphere was I would say really
23 pleasant. Everyone had a good time. They worked
24 together well. I don't know, it could be a summer
25 camp, or at times when people are there for long

Page 19

1 periods of time working together, a lot of laughter.
2 Really comfortable environment. It was great I
3 thought.

4 Q Did you witness any interactions between
5 Dr. Luke and Kesha during the "Animal" recording
6 sessions?

7 A Yes.

8 Q How would you characterize those
9 interactions?

10 A They were pleasant. They laughed a lot
11 together. They would, you know, hang out outside
12 the studio, have their lunches together. They'd
13 talk a lot.

14 Yeah, just laughter a lot, and it just
15 seemed like they really enjoyed being around each
16 other.

17 Q Would you characterize Kesha as being
18 comfortable, uncomfortable, somewhere in between,
19 around Dr. Luke at this time? How would you
20 characterize that?

21 A She seemed very comfortable.

22 Q Did Kesha ever complain to you about
23 Dr. Luke?

24 A She did not.

25 Q Just to step back for a moment, do you

Page 20

1 recall who else was present during the Flo Rida
2 recording session that you testified to earlier?

3 A Best of my memory, Dr. Luke, Kesha, Emily
4 Wright. That's all I can remember.

5 Q And during that Flo Rida session, do you
6 recall if Kesha was comfortable, uncomfortable,
7 somewhere in between around Dr. Luke? How would you
8 characterize it?

9 A She seemed very comfortable. I remember
10 her being really excited. This may have been one of
11 her first recordings on a song. I just remember her
12 being really pumped and really excited.

13 Q Mr. Gibbs, are you familiar with an EP by
14 Kesha entitled "Cannibal"?

15 A Yes.

16 Q Were you present for any portion of the
17 recording of "Cannibal"?

18 A Yes.

19 Q And where did this recording occur for
20 which you were present?

21 A Conway Recording Studios.

22 Q And do you recall if this recording was
23 before or after or during the sessions for "Animal"?

24 A This was after the recording sessions for
25 "Animal."

Page 21

1 Q Do you recall approximately when this was
2 that "Cannibal" was recorded?

3 A Approximately late 2009, earlier 2010.
4 Around there.

5 Q What how would you -- strike that.

6 How long were the sessions at Conway for
7 which you were present for "Cannibal," if you
8 recall?

9 A From what I recall they had a good chunk
10 of time, maybe three weeks where I think they booked
11 out the entire facility, three rooms, yeah.

12 Q How would you describe the general
13 atmosphere at Conway during the recording sessions
14 for "Cannibal"?

15 A Similar to "Animal." Maybe more exciting.
16 I think she was just coming off success of "Tick
17 Tock," her first album.

18 And, yeah, it was a lot of work, lot of
19 hanging out. Lot of times sessions would be over
20 and artists, producers would stay and hang out and
21 have a good time together.

22 Q Do you recall who was present for these
23 sessions in addition to Kesha?

24 A Yes.

25 Q Who else was present, to your

Page 22

1 recollection?

2 A Dr. Luke, producer Kojak, producer Ammo,
3 producer Benny Blanco, engineer Emily Wright.
4 That's all that is coming to memory right now.

5 Q Do you recall speaking with Kesha during
6 the "Cannibal" recording session?

7 A Yes.

8 Q Do you recall what you and Kesha spoke
9 about?

10 A Same small talk of working environment,
11 please and thank yous, hello/good-byes.

12 I did give her a ride home one time. We
13 didn't speak in the car. The only thing I recall
14 from it was her -- we were about to pull out and
15 hearing, "Hold on, I need money." And she went to
16 Luke, and Luke gave her some money.

17 We left Conway. She had me stop at the
18 Bank of America on Hillhurst, I believe, and
19 Prospect in Los Feliz. I think she got a Starbucks,
20 and then I took her home from there. From what I
21 remember she was on the phone with a friend, didn't
22 talk to me much.

23 My position working at the studio, if I'm
24 driving a client, like, I'm a limo driver. I don't
25 engage in conversation.

Page 23

1 Q Did you witness any interactions between
2 Kesha and Dr. Luke during the "Cannibal" recording
3 sessions?

4 A Yes.

5 Q How would you characterize those
6 interactions?

7 A Again, great. Just, you know, I saw
8 them -- all of the people there in those sessions as
9 a big, happy family. All very comfortable with each
10 other, and they had a really good time.

11 Q So how would you characterize Kesha around
12 Dr. Luke at this time, comfortable, uncomfortable,
13 somewhere in between?

14 A She was comfortable.

15 Q Do you remember Kesha ever coming by the
16 Conway studio for reasons other than recording?

17 A Yes, I remember one time.

18 Q Okay. And what was that time? When was
19 it, if you recall?

20 A I don't recall the date too well. It was
21 after "Animal." So maybe 2009-ish she came to do a
22 photo shoot with her car.

23 Q Do you recall who else was there besides
24 Kesha?

25 A I think only -- I only remember -- I don't

Page 24

1 know their names, people from her team.

2 Q Was Dr. Luke there?

3 A No.

4 Q Okay. During the Flo Rida sessions did
5 you witness any yelling by anyone?

6 A No.

7 Q Did you witness anyone making any threats
8 of any nature?

9 A No.

10 Q Do you recall hearing any conversations of
11 a sexual nature?

12 A No.

13 Q During the "Animal" sessions do you recall
14 hearing any yelling?

15 A No.

16 Q Okay. Do you recall hearing any comments
17 of a sexual nature?

18 A Only thing when they are hanging out on
19 the patio, talking about having sex with someone the
20 night before, I heard Kesha mention, or they all
21 talked jokingly about it. That's probably it.

22 Q So Ms. Sebert talked about having sex that
23 you recall?

24 A Yeah, and -- yeah, one-night stands or --
25 yeah, sex.

Page 25

1 Q Do you recall any details about
2 Ms. Sebert's conversations about sex at this time?

3 A No.

4 Q During the "Cannibal" sessions do you
5 recall any yelling by anyone?

6 A No.

7 Q Do you recall anyone making any threats?

8 A No.

9 Q Do you recall any conversations of a
10 sexual nature?

11 A Yes, similar to the last time, just them
12 talking about private conversations where I just
13 happened to be near it enough to hear. But yeah,
14 talking about sex.

15 Q Did Ms. Sebert participate in those
16 conversations?

17 A Yes.

18 Q Okay. Did Ms. Sebert make comments of a
19 sexual nature?

20 A Yes.

21 Q Okay. Do you recall what those comments
22 were?

23 A Not these conversations.

24 Q Okay. Do you recall generally?

25 A Generally, current guy she was seeing or

Page 26

1 similar stuff like that.

2 Q Are you familiar with an a album by Kesha
3 entitled "Warrior"?

4 A Yes.

5 Q Were you present for any portion of the
6 recording of "Warrior"?

7 A Yes.

8 Q Okay. At the time when "Warrior" was
9 recorded who were you employed by?

10 A I was employed by Kemosabe Records.

11 Q Was Dr. Luke involved in the recording of
12 "Warrior"?

13 A Yes.

14 Q Okay. Did you witness Dr. Luke
15 participate in the recording of "Warrior"?

16 A Yes.

17 Q Do you know how much of Dr. Luke's
18 participation you witnessed?

19 A I would say majority.

20 Q How much of Kesha's participation in the
21 recording did you witness?

22 A I would say majority.

23 Q What were your job responsibilities during
24 the recording of "Warrior"?

25 A At the time of "Warrior" I was recording

Page 27

1 engineer recording Kesha, other songwriters,
2 singers. I was in charge of setting up the
3 sessions. Food riders -- making sure all the needs
4 of the clients, artists, producers were met for the
5 day. And also file security, making sure the album
6 was protected, wouldn't leak. That was my
7 responsibility.

8 Q Did you work directly with Dr. Luke?

9 A Yes.

10 Q Okay. How often did you work directly
11 with Dr. Luke?

12 MS. SMITH: Objection. What time frame?

13 BY MR. MOVIT:

14 Q During the recording of "Warrior."

15 A During "Warrior" it was about five to six
16 days a week, about 10 to 14 hours a day.

17 Q During the recording of "Warrior" did you
18 work directly with Kesha?

19 A Yes.

20 Q How often did you work directly with Kesha
21 during the recording of "Warrior"?

22 A Five to six days a week, about 10 to 14
23 hours a day.

24 Q Do you know when the recording sessions
25 for "Warrior" were scheduled to begin?

Page 28

1 A Yes.

2 Q When was that?

3 A July 2012 -- sorry, excuse me,
4 January 2012.

5 Q Do you know where they were supposed to
6 begin in January 2012?

7 A Yes, at the Record Plant recording studio.

8 Q Did the sessions for "Warrior" begin in
9 January 2012?

10 A No, they did not.

11 Q Did Kesha appear for the sessions in
12 January 2012?

13 A She did not.

14 Q Were any preparations made to commence
15 recording in January 2012 for the "Warrior" album?

16 A Yes. We had booked the Record Plant, from
17 my memory two -- at least two rooms, and I had done
18 equipment rentals. I had done the setup for both
19 rooms. Producers came in to work. And, yeah, that
20 was the preparation.

21 Q Who was set to record -- do you know who
22 was set to record with Kesha in January 2012,
23 besides yourself?

24 A For certain, I know Dr. Luke and producer
25 Cirkut were there to work with her. Max Martin may

Page 29

1 have been starting around that time as well. Benny
2 Blanco may around that time as well.

3 From my understanding, people who were
4 going to be involved in the project were sort of
5 told: Be ready to start working in January.

6 Q When did the recording sessions for
7 "Warrior" actually begin?

8 A I believe it was late February, early
9 March 2012.

10 Q When did Ms. Sebert appear for the
11 recording sessions for "Warrior," do you know?

12 A I believe that same time.

13 Q Do you know why the sessions did not begin
14 in January?

15 A I do not. We kept being notified by
16 Rainey Hancock, her A & R, that: Not this week.
17 Not this week. That's the extent of my knowledge on
18 that.

19 Q So following the beginning of
20 January 2012, you weren't sure exactly when those
21 sessions were actually going to begin; is that fair?

22 A Yes.

23 Q And when the recording sessions finally
24 commenced for the "Warrior" album, where did
25 recording first take place?

Page 30

1 A At the Record Plant.
 2 Q Did recordings continue thereafter
 3 anywhere else?
 4 A Yes.
 5 Q Where did they continue next?
 6 A They continued next at Dr. Luke's Malibu
 7 house.
 8 Q And where did they continue after that
 9 anywhere?
 10 A At one point in that time we went to
 11 Nashville to work at Blackbird Studios. We returned
 12 to Dr. Luke's Malibu studio. Then sessions
 13 continued at Studio Malibu in Malibu, California.
 14 Q What is Studio Malibu?
 15 A It's a recording studio in Malibu.
 16 Q Are you aware of Ms. Sebert's public
 17 persona?
 18 A Yes.
 19 Q How would you describe that public
 20 persona?
 21 A I would describe her as a pop star/rock
 22 star, party girl, carefree, sort of "take on the
 23 world" partyer/rock-star type person.
 24 Q Did you see any behavior by Ms. Sebert
 25 during "Animal" and "Cannibal" recording sessions

Page 32

1 her, she needed to go to the bathroom, and she
 2 didn't want to go downstairs to where the restroom
 3 was, and she decided she wanted to relieve herself
 4 in the bathroom of the vocal booth. I didn't see
 5 her do it.
 6 There was a glass. I saw her bend down,
 7 and then I heard her pee. And I remember her
 8 jokingly saying, you know, "Someone talk or play
 9 music, so you don't hear me pee."
 10 I think Monica, her manager, was either in
 11 the room with me when that was happening or just
 12 outside. I know she was aware of it.
 13 After that I had gone downstairs to the
 14 staff of the studio, asked them where I can dispose
 15 of this? I had been in their shoes before. I don't
 16 want to make them clean it. They told me it was
 17 their job, they'd take care of it. I don't believe
 18 we recorded any more that night.
 19 I know the studio did talk to me about it,
 20 saying they wouldn't like that to happen again.
 21 At times during "Warrior," we were in
 22 Nashville, and they -- Kesha, Dr. Luke, Cirkut,
 23 Kojak, maybe Monica, they had went to a strip club
 24 together.
 25 I didn't go. I had the hard drives for

Page 31

1 that was consistent with that persona?
 2 A Yes.
 3 Q What was that behavior?
 4 A Her general way she carried herself at the
 5 recording studio: Drinking, partying.
 6 I had gone to a video shoot to -- for one
 7 of her songs. I don't know which song. I don't
 8 think the video was even used.
 9 And it was a house party in Echo Park,
 10 from what I remember, and there was drinking going
 11 on there. I remember Kesha jumping around, licking
 12 people's faces, getting the camera on it.
 13 I was there for about an hour, then I
 14 left. And yeah, from what I had, you know, seen on,
 15 you know, TV and that she carried herself that way
 16 in the recording studio as well.
 17 Q During the recording of "Warrior" did you
 18 observe any behavior by Ms. Sebert that was
 19 consistent with her public persona?
 20 A Yes.
 21 Q What was that behavior?
 22 A A few things. She would drink during the
 23 sessions, usually bottle of Jack Daniels in the
 24 room.
 25 On one occasion when I was working with

Page 33

1 the album, so I went back to the hotel to keep them
 2 safe.
 3 And I remember the doors to the hotel
 4 locked after-hours, and so when everyone got to the
 5 hotel I had to let them in. Kesha was staying at
 6 her house. I just remember -- and I remember Kesha
 7 drunkenly going outside the window, like, something
 8 to the effect of: Clint, let me come up to your
 9 room. I love your beard.
 10 At the time I had a large beard. I said
 11 no.
 12 I remember Kojak going, "Kesha, go home,"
 13 you know. It ended after that, and she went home.
 14 I went to my hotel room alone.
 15 Those are things that come to memory right
 16 now.
 17 Q Now when you mentioned before about
 18 urinating in the vocal booth, you had said -- where
 19 in the vocal booth? Did she urinate anything into
 20 in the vocal booth?
 21 A Into A plastic trash can.
 22 Q Okay. You said before she urinated in the
 23 bathroom. Were you -- did you misspeak when you
 24 said that?
 25 A Oh, I misspoke. The only bathroom at the

Page 34

Record Plant is downstairs. We were upstairs in a room called Digiplant. And she was jokingly saying it's too far, even though it's probably -- the stairwell is 10 feet outside the room, maybe 20 steps down. You turn right, bathroom is right on your left.

I think she wanted to pee in the trash can. And so, yeah, excuse me, she peed in a trash can in the vocal booth at the Record Plant.

Q Had Ms. Sebert chosen to urinate in the bathroom instead of the vocal booth, how long would it have taken her to get to the bathroom from the vocal booth?

A If you really had to pee, 30 seconds.

Q Could you hear Ms. Sebert urinate?

A Yes.

Q Okay. How did you feel when Ms. Sebert urinated in the vocal booth?

A I didn't feel too comfortable. Sort of awkward, someone peeing on the other side of the wall from you.

I think I remember going in to adjust something on the mic, and you could smell it. That wasn't enjoyable. Um, yeah.

Q Did Ms. -- did you hear Ms. Sebert ask

Page 35

anyone if it was okay for her to urinate in the trash can before she did so?

A No.

Q Had Ms. Sebert asked you whether or not it would be okay for her to urinate in the trash can what would you have said?

A "No, thank you. Could you please go downstairs."

Q You mentioned another incident in a hotel in Nashville --

A Yes.

Q -- where Ms. Sebert asked to go into your room?

A Yes.

Q How did -- how did you feel during that incident?

A Um, uncomfortable, nervous. Kesha at that time was like very aggressively flirty. I was shy, and I think she maybe even told me, like, "Oh, I like shy guys."

And I think she enjoyed making me squirm a little bit and get flushed red, as I do when I get embarrassed.

Yeah, and I was there on a work trip with my boss and other coworkers. And any time an artist

Page 36

shows any -- anything to that degree towards you, I get uncomfortable. So yes, I was uncomfortable.

Q Do you recall ever hearing Ms. Sebert have any other conversations about the subject of urine?

A I do.

Q Okay. What do you recall about -- her saying about that subject?

A We didn't have any real personal one-on-one conversations on the subject of urination, pee.

A lot of times when I'm working with Kesha in a room, I'm at the computer recording or editing, and she may be in the room with another songwriter or producer. And so a lot of times when I overheard her talk about pee was in this way, she would talk about how she drank her own pee and health benefits with doing that.

I also overheard jokingly talk about making her manager, Monica, drink her own pee. She talked about it and sort of -- Monica wasn't there. If Monica was there she never brought that up.

But I definitely overheard her discuss that with random people who were working with her in the room. And, yeah, that's what I remember from that.

Page 37

Q And do you know Monica's last name?

A Corina? Corino? Similar to that.

Q How would you generally describe the way that Kesha treated Monica?

A She generally treated Monica with -- more like an assistant I would say than a manager. You know: Get my bags. Do this. She didn't seem the nicest to Monica, in my opinion.

And especially, you know, hearing making her drink her own urine. That's horrible. Yeah, that's my opinion.

MR. MOVIT: Take a five-minute break.

THE VIDEOGRAPHER: Going off the record at 1:19 p.m.

(A recess was taken from

1:19 p.m. to 1:47 p.m.)

THE VIDEOGRAPHER: We're back on the record at 1:47 p.m.

Counsel, you may proceed.

BY MR. MOVIT:

Q Mr. Gibbs earlier you mentioned that during the "Animal," "Cannibal" sessions hearing comments of a sexual nature from persons other than Ms. Sebert.

Do you recall who those persons were?

Page 38

1 A Yes, from the best of my memory, other
2 producers, songwriters who were working with her at
3 the time. She would have friends come to the studio
4 to hang out. Yes.

5 Q Were any of those persons who made sexual
6 comments Dr. Luke?

7 A No. Most of the time Luke left before
8 most people in the sessions. And usually once Luke
9 left, people would gather on the patios to have, you
10 know, a few drinks before they went home, and this
11 is when I would overhear sexual talk like that.

12 Q Have you ever heard Mr. Gottwald make
13 sexual comments?

14 A No.

15 Q Mr. Gibbs, earlier you were talking about
16 incidents that you recall in which Kesha Sebert
17 acted in a way that was consistent with her public
18 persona.

19 Do you recall any other such instance?

20 A Yes, I remember while we were working on
21 "Warrior," when I was working with her in the
22 Digiplant room she was with I think Benny Blanco.
23 They were on the couch behind me. And I remember
24 Kesha telling Benny, "Squeeze my boobs," like:
25 "Feel them."

Page 39

1 And I remember Benny, as his character,
2 "Ewww, that's gross, ha ha ha ha," and the laugh he
3 does, and he did squeeze once.

4 Q Mr. Gibbs, do you know how many houses
5 Mr. Gottwald maintained, in or about January and
6 February 2012?

7 A Yes.

8 Q How many houses?

9 A It was three.

10 Q Can you describe where those houses were.

11 A Two of the houses were right next to each
12 other in West Hollywood in the Hollywood Hills, and
13 the third house was in Malibu on the beach.

14 Q Do any of those houses have basements?

15 A No.

16 Q Mr. Gibbs, do any of Mr. Gottwald's houses
17 have recording studios in them?

18 A Yes, all three of those houses.

19 Q Do the recording studios have locks?

20 A Yes.

21 Q Are the locks on the inside of the doors,
22 the outside of the doors or both?

23 A All the locks are on the inside of the
24 door.

25 Q Okay. So it would not be possible to lock

Page 40

1 anyone in?

2 MR. LITTLE: Objection. Leading.

3 BY MR. MOVIT:

4 Q Would it be possible to lock anyone in any
5 of these studios against their will?

6 A No. I locked these doors every night, and
7 I would reach in, I would do the lock, and close it.
8 And I checked that it is locked. So all -- yeah, I
9 reach in, so all the locks are on the inside.

10 MR. MOVIT: Just for the record, Mr. Gibbs was
11 making a hand gesture of pantomiming reaching inside
12 the door to lock it from the inside.

13 THE WITNESS: Yes.

14 MR. MOVIT: I'd like to next mark as an exhibit
15 Gibbs No. 1.

16 (Exhibit 1 was marked for
17 identification by the Reporter.)

18 BY MR. MOVIT:

19 Q The document I have marked was produced by
20 Mr. Gibbs through his counsel. It's Bates marked
21 Gibbs 1 through Gibbs 9.

22 Mr. Gibbs, have you seen this document
23 before?

24 A Yes.

25 Q Okay. What is this document?

Page 41

1 A It's a collection of screenshots from my
2 cell phone.

3 Q Who took the screenshots?

4 A I did.

5 Q At the top of the page, Mr. Gibbs, it
6 says, "K\$."

7 Do you see that, sir?

8 A Yes.

9 Q What does that mean?

10 A Alias for Kesha.

11 Q Mr. Gibbs, if you will see that there is
12 balloons on these pages in two colors. Do you see
13 that, sir?

14 A Yes.

15 Q And one color is gray, and one color is
16 green; correct?

17 A Yes.

18 Q Okay. Do you know who -- do you know what
19 it means for some of the messages to be gray?

20 A Yes.

21 Q Okay. What does that mean?

22 A That's who sent to me.

23 Q And do you know what it means for the
24 message to be green?

25 A Yes, those are my replies.

Page 42

1 Q Okay. And as of today do you know who
2 sent the gray messages to you?
3 A Yes.
4 Q And who sent the gray messages to you?
5 A Kesha.
6 Q And at the top of the page 1 it states
7 April 27, 2012, 9:57 p.m.; correct?
8 A Yes.
9 Q Is it your understanding that the sending
10 of these messages commenced on or about 9:57 p.m. on
11 or about April 27, 2012?
12 A Yes. And I actually remember exactly when
13 I was -- when I received these. I was at Bui Sushi
14 in Malibu, picking up dinner for Kesha, myself and
15 other people we were working with.
16 I was with the hostess about to pay, and I
17 may have already gotten the "wiener" text. I
18 remember getting the dick bouquet sort of while I
19 was up there, and I remember receiving that quickly,
20 turning it away so the hostess didn't see it.
21 So yes I remember this conversation well.
22 Q If you would please turn to page GIBBS2 at
23 the top of the page. There is a picture at the top
24 of page 2. Is that the dick bouquet to which you
25 referred?

Page 44

1 am?" Were those sent by you?
2 A They were.
3 Q And then the response is, "I know enough";
4 is that correct, sir?
5 A Yes.
6 Q And that response was sent by Ms. Sebert?
7 A Yes.
8 Q And then the next message is "Rugh oh."
9 Is that sent by you, sir?
10 A Yes.
11 Q And then the next message is "1 clue," and
12 that was sent by Ms. Sebert; correct?
13 A Yes.
14 Q And then the next message is "Si."
15 Is that "si" in Spanish?
16 A Yes.
17 Q Okay. What is your understanding of what
18 the word "si" means?
19 A Yes.
20 Q And then your next message is -- an image
21 which you referred to as the bouquet; correct?
22 A Yes.
23 Q And then how did you feel to receive this
24 picture?
25 A I was not comfortable. I don't enjoy

Page 43

1 A It is.
2 Q Mr. Gibbs, if you would please turn back
3 to page 1. The first message says, "Wiener";
4 correct?
5 A Yes.
6 Q At the time that you received this
7 message, the one that said "Wiener," did you know
8 who was sending you the message?
9 A I did not.
10 Q Okay. And then the next message says:
11 "Hmm, why yes. I am"; correct, in
12 response?
13 A Correct.
14 Q And you sent that?
15 A I did.
16 Q Okay. And then it says, "Do you know who
17 this is?" Correct?
18 A Correct.
19 Q And that was sent by Ms. Sebert; correct?
20 A Yes.
21 Q Okay. At that time did you know who was
22 sending you the message?
23 A No.
24 Q Okay. And then the next three messages
25 state, "Nope," smiley face, and "Do you know who I

Page 45

1 looking at penises. And receiving a bundle of them
2 like this, while I was out in public, and -- yeah, I
3 felt uncomfortable.
4 Q Did you have -- please go on, sir.
5 A I sort of felt, to receive this text
6 message from someone I was working with was -- I
7 have never experienced before. So yeah, I was
8 uncomfortable.
9 Q The next message says, "Excuse me while I
10 gouge eyes out"; correct?
11 A Correct.
12 Q Then what did you mean by that?
13 A I almost literally meant that, but I
14 didn't gouge my eyes out.
15 Q Then the next message says:
16 "Nashville? Hmm," what did you mean by
17 that?
18 A After receiving that I had a pretty strong
19 idea who it was, and I searched the Area Code. It
20 said Nashville, you know, pretty -- I thought I knew
21 who it was then.
22 Q And by the "Area Code," you mean the Area
23 Code of the phone who had sent you these messages?
24 A Yes.
25 Q And that phone had a Nashville area code?

Page 46

1 A Yes.
 2 Q And then the next two messages say, "Oh
 3 shit. Plans foiled," and those were sent by
 4 Ms. Sebert?
 5 A Yes.
 6 Q Okay. And then the next negative says:
 7 "Food is here," smiley face. Was that sent by you?
 8 A Yes.
 9 Q Okay. And what did you mean by that?
 10 A I had returned from Bui Sushi. And when I
 11 returned I set all the food up on a table, place
 12 settings, and once all the food is ready, so I
 13 didn't disrupt the session I'll text them, "Food is
 14 here." So I text her food was ready.
 15 Q Did Ms. Sebert ever ask you if it would be
 16 okay with you for her to send you sexually explicit
 17 photographs?
 18 A She did not.
 19 Q Had she asked what would you have said?
 20 A No, thank you.
 21 Q And then the next message says, "Thanks
 22 for the dong bouquet! Travel well"; correct?
 23 A Correct.
 24 Q And that was sent by you?
 25 A Yes.

Page 47

1 Q And why did you send this message?
 2 A At the time -- this was my first sort of
 3 major recording gig. And, you know, working with
 4 Kesha, she was the client, I was staff, I didn't
 5 want to cause any ripples. You know, I didn't want
 6 her to not feel comfortable around me, asking me to
 7 not work on the session.
 8 So I thought in a satirical way saying,
 9 "thank you for the dong bouquet. Travel well," was
 10 a way to end that part of it.
 11 Q And then the next message is from
 12 Ms. Sebert; correct?
 13 A Correct.
 14 Q It says, "Ha. Thanks. And I'm happy u
 15 enjoyed the cocks," smiley face; is that correct?
 16 A That is correct.
 17 Q And the next message says, "Blaah still
 18 gross. Thought that counts," smiley face; correct?
 19 A Correct.
 20 Q And that was sent by you?
 21 A Yes.
 22 Q And why did you send that message?
 23 A I was still chatting with her. I just
 24 wanted to make it clear that I thought that was
 25 still gross. I guess I said I appreciated she

Page 48

1 thought of me.
 2 Q And then the next message says, "Ha. Yep.
 3 Def. Thought of you." And that was sent by
 4 Ms. Sebert; correct?
 5 A Yes.
 6 Q Okay. And then the next message says,
 7 "Werd life! Lbcin ya monday. Nite!"
 8 A Yes.
 9 Q And that was sent by you?
 10 A Yes.
 11 Q And what did you mean by that?
 12 A A little bit of slang term I used back
 13 then.
 14 "Werd life," it's almost like "thank you."
 15 "Lbcin ya monday" was "I'll be seeing you
 16 Monday." And "nite" for good night.
 17 Q And then the next thing on the page it
 18 says June 1st, 2012, 2:50 p.m.; correct?
 19 A Correct.
 20 Q And is it your understanding that the
 21 messages following that date and time were sent on
 22 or about June 1st, 2012?
 23 A Yes. Again, with this correspondence I
 24 remember exactly where I was. I was in Nashville at
 25 the airport leaving Nashville at the security bag

Page 49

1 check-in.
 2 I was with myself, Dr. Luke, Kojak.
 3 Cirkut was there. Yeah, I remember she was texting
 4 me pictures of drum sets.
 5 Q Do you know why Ms. Sebert was texting you
 6 pictures of drum sets?
 7 A Yes, when we had visited her house in
 8 Nashville, she had asked my opinion on where, you
 9 know, a good place to put drums would go. And I
 10 think I had said, "Oh, this area."
 11 And I can't remember if she asked if, "Can
 12 I send you pix" or not, but I remember receiving
 13 this, though.
 14 Q Okay. And so on the first page -- excuse
 15 me, on page GIBBS4 there is a picture of the drum,
 16 and then the word "Cool?" Those were sent to you by
 17 Ms. Sebert?
 18 A Yes.
 19 Q And then there is two messages in green
 20 that say: "That would look so dope over your wood
 21 floors. Luke and Kojey think so too," smiley face.
 22 Those were sent by you?
 23 A Yes.
 24 Q Okay. And Luke and Kojey are Dr. Luke and
 25 Kojak?

Page 50

1 A Correct.

2 Q And then it says -- there is messages in

3 gray that say, "Ok or," and then a picture of

4 another drum.

5 Were those sent by Ms. Sebert?

6 A Yes.

7 Q Okay. And then it says:

8 "I like the rich wood look. Works

9 more with ya woods vibe."

10 Was that sent by you?

11 A Yes.

12 Q What did you mean by that?

13 A The drum set she had sent earlier I

14 thought the natural wood design would look good in

15 her house, which had a lot of rich, dark woods, and

16 her house was in the woods. That was my opinion on

17 the drum set.

18 Q And then next message says (as read):

19 "But if that was gold glitter

20 we'd have another story on

21 our hands," and that was sent by you?

22 A Yes.

23 Q It says, "I kno it," and that was sent by

24 Ms. Sebert?

25 A Yes.

Page 52

1 And, yeah, it was sort of a running joke

2 that I would say went on to the end of the recording

3 of Warrior.

4 Q How did -- how did you feel about

5 Ms. Sebert telling you that you would never get laid

6 again?

7 A I didn't believe her.

8 Q The next message says: "Hah Werd!" and

9 that was sent by you?

10 A Yes.

11 Q And then the next message, it's a picture

12 of a gentleman, including his bare buttocks, and

13 then a picture of some drums; is that correct?

14 A Yes.

15 Q Okay. Who sent you those two pictures?

16 A Keshia.

17 Q Do you know who the gentleman is that is

18 showing his buttocks?

19 A I do not.

20 Q Okay. Were you in public when you

21 received this message?

22 A Yes, still at the airport.

23 Q How did you feel to receive this picture

24 of a man's buttocks in public at the airport?

25 A I thought it was gross.

Page 51

1 Q And it says:

2 "Thanks again fer all de

3 hospitality. LBCin ya soon."

4 Who was that sent by?

5 A Yes.

6 Q And what did you mean by that?

7 A I was thanking her for showing us a good

8 time in Nashville. She was very hospitable, and

9 just wanted to thank her for having me out to work

10 on her -- in her hometown.

11 Q And then the next message says: "Anytime.

12 Just don't get a kia."

13 A Yes.

14 Q And who was that sent by?

15 A Keshia.

16 Q Okay. Do you know what Ms. Sebert meant

17 by that?

18 A Yeah, I had talked about -- I had a big

19 Dodge Ram truck at the time. And she had mentioned

20 that was hot.

21 And I was getting rid of it for better gas

22 mileage, and I had test driven a KIA. I was like:

23 Oh, I'm going to get this KIA. And that sort of

24 became a running joke with her, like: Don't get a

25 KIA, you'll never get laid again.

Page 53

1 Q Did Ms. Sebert ever ask you if it would be

2 okay to send pictures with a man's buttocks in them

3 to you?

4 A No.

5 Q Okay. If she had asked what would you

6 have said?

7 A "No, thank you."

8 Q Do you know who the man is who is showing

9 his buttocks in this picture?

10 A I do not.

11 Q And then the next message says, "Are dws

12 drums?" Did Ms. Sebert send that message?

13 A She did.

14 Q Okay. Do you have an understanding of

15 what that means?

16 A I do.

17 Q What is that understanding?

18 A She's asking the quality of the brand, DWS

19 drums.

20 Q And then the next two messages say -- next

21 message says:

22 "Yea I had a DWS kit that was great

23 had it for years. I like them and

24 premier a lot."

25 Was that sent by you?

Page 54

1 A Yes.
 2 Q What is Premier?
 3 A Another drum manufacturer.
 4 Q And then the next message says, "Ew crack
 5 kills buddy."
 6 A Yes.
 7 Q And that was sent by you?
 8 A Yes.
 9 Q And what did you mean by that?
 10 A I was referring to the picture she sent of
 11 the guy's butt on the page GIBBS6. I think both
 12 these pictures came in succession, and I responded
 13 to the drums one first, and then made reference to
 14 the guy's butt.
 15 Q Okay. And the next two messages say, "Are
 16 Gretch ones good? Better?"
 17 And those were sent by Ms. Sebert?
 18 A Yes.
 19 Q Do you have an understanding of what she
 20 meant?
 21 A Yes, Gretch is another drum company.
 22 Q And then the next message says:
 23 "Depends which one. Old or new?
 24 Patrick was playing on a Gretch on
 25 Wonderland."

Page 56

1 green on the page.
 2 A "Mmm chyea."
 3 Q And that was sent by you?
 4 A Yes.
 5 Q Okay. And what did you mean by that?
 6 A It's a saying I hear people use in music.
 7 It's like, "Yeah," like, "definitely yeah."
 8 Q And then the next thing on the page is a
 9 picture of three blue drums. And that was sent to
 10 you by Ms. Sebert?
 11 A Yes.
 12 Q Okay. And then there is a message that
 13 says -- could you please read the next message.
 14 A "That's ye Gretch? Looks dope!"
 15 Q And you sent that message?
 16 A I did.
 17 Q Okay. And what does that mean?
 18 A Um, I think I meant to say, "That's a
 19 Gretch," question mark. I said it looked cool. It
 20 looked dope.
 21 Q The next message is "Yeah!" and that was
 22 sent by Ms. Sebert?
 23 A Yes.
 24 Q And could you please read the next message
 25 on the page, which is in green.

Page 55

1 And did you send that message?
 2 A I did.
 3 Q And what did you mean by that?
 4 A In regards to old and new, old Gretch is
 5 just old instruments, go for more money. New
 6 instruments they have different -- I just was saying
 7 that new ones aren't as good.
 8 And then Patrick is the drummer of the
 9 Black Keys. And while we were in Nashville he
 10 played drums, at Kesha's request to play on her song
 11 Wonderland. We had rented another room, set it all
 12 up.
 13 I just remember Patrick not doing so great
 14 on the recording, and I remember Kesha being openly
 15 embarrassed about it, like, how -- I recommended my
 16 friend. He's not doing a good job. I'm so
 17 embarrassed. That's what I remember from that.
 18 Q And then it says, "Old and sparkley, Hold
 19 pleeze," and those were sent by Ms. Sebert those two
 20 messages?
 21 A Yes.
 22 Q Do you know what she meant by that?
 23 A I think I was asking if it was old or new.
 24 She said it was old and sparkly.
 25 Q Could you please read the next message in

Page 57

1 A (Reading):
 2 "That or the first wood grain one
 3 are ma favz. Artie old tune them
 4 to sound huge."
 5 Q Okay. And what does that mean?
 6 A I was saying I liked the first wood grains
 7 ones were my favorite.
 8 Artie, if I remember, he was a drum tech
 9 in Nashville, who was working with us then, and he
 10 had tuned the drums for the song Wonderland a
 11 certain way.
 12 And I heard him say you got to tune them
 13 the old way, so they sound huge. And I was
 14 referencing that.
 15 Q And then the next message says:
 16 "I think im" -- I'm going to try to
 17 read this -- "I think ima go Gretch
 18 instead of dw."
 19 And that was sent by Ms. Sebert?
 20 A Yes.
 21 Q And then the next message is in green. It
 22 was sent by you; correct?
 23 A Yes.
 24 Q Okay. Could you read it, please.
 25 A (Reading):

Page 58

1 "Yay congrats on your new skins.
 2 We bout to liftoff! Whoop whoop."
 3 Q And what did you mean by that?
 4 A "Skins" is a slang term for drums. So
 5 saying congrats on your new drums. We about to take
 6 off from Nashville back to Los Angeles. Whoop
 7 whoop.
 8 Q Okay. And then the last message on the
 9 page says, "Safe flight" exclamation point "Xx," and
 10 that was sent by Ms. Sebert?
 11 A Yes.
 12 Q Mr. Gibbs, aside from Exhibit Gibbs 1, do
 13 you recall any other instances where Ms. Sebert
 14 communicated with anyone about the subject of
 15 pictures of penises?
 16 A Yes.
 17 Q Could you please explain.
 18 A She -- I remember when we were working out
 19 of Luke's Malibu studio, sometimes Dr. Luke and
 20 Cirkut would be upstairs working on a beat or a
 21 production for an hour or so at a time or comping
 22 vocals that she had recorded.
 23 So she would come downstairs a lot and
 24 hang out with us, and I was down there often.
 25 Myself would be down there, Kesha, Lagan was there.

Page 60

1 thought that to be true.
 2 She had bragged about wanting to make a
 3 penis book like the Plaster Casters, like a -- you
 4 know, it's these groupies in the '70s that did molds
 5 of rock stars' penises.
 6 And she made it sounds like she had enough
 7 to make a book, people she slept with, penises.
 8 Q How did you feel when Ms. Sebert tried to
 9 show you a picture of a penis on her phone?
 10 A Uncomfortable. I didn't want to see it,
 11 got embarrassed. You know, and to a certain degree,
 12 you know, since she was the client I was working
 13 with I didn't want to offend too much by saying:
 14 Get away from me, or anything like that. So I would
 15 just laugh, I'll say, "No, ewww, I don't want to see
 16 that," look away.
 17 Q Just for the record, Mr. Gibbs, who is
 18 Lagan?
 19 A Lagan is Kesha's brother.
 20 Q Who's Irene Richter?
 21 A Irene Richter was -- worked for Dr. Luke.
 22 Q During the recording of the "Warrior"
 23 album, how would you describe Kesha Sebert's
 24 demeanor?
 25 A During "Warrior" she was in good spirits.

Page 59

1 Some days Monica was there, pretty much every time,
 2 I would say every time she was there. Irene Richter
 3 was there.
 4 And I remember Kesha bragging about all
 5 the dick pix she had on her cell phone, some of them
 6 being celebrities, one person being Calvin Harris.
 7 And I remember her commenting on how big it was, his
 8 penis.
 9 I wasn't partaking in these conversations.
 10 They were sitting on the couch. I was at a dining
 11 room table.
 12 I remember Kesha going to people, "Do you
 13 want to see? Do you want to see?" forcing Irene
 14 Richter, flashing the phone at people.
 15 I think she flashed the phone once to me,
 16 and I knew what she was planning and looked away
 17 before she did.
 18 I also had heard at the Record Plant, I
 19 don't know who she was talking about, but I
 20 overheard this conversation how no guy can come on
 21 her tour bus unless she gets a picture of their
 22 penis, a Polaroid picture.
 23 And I remember I had been to one of her
 24 concerts, and we were -- I went back stage, and saw
 25 the tour bus and went the other direction because I

Page 61

1 Any time she wasn't in good spirits she usually had
 2 to do, you know, if someone didn't like an idea,
 3 someone she was working with, or she would get
 4 frustrated in herself a lot if she couldn't nail a
 5 chorus or get the lyrics right. She was a bit
 6 sporadic. Didn't come off to me the earlier Kesha I
 7 knew.
 8 She was a -- she wouldn't -- she didn't
 9 dress up to the studios a lot. She would just sort
 10 of come and be in pajamas, and she was hard to work
 11 with at times during the "Warrior" session.
 12 Q Do you recall conversations about the
 13 subject of Kesha's weight during the recording of
 14 "Warrior"?
 15 A Yes.
 16 Q What do you recall about those
 17 conversations?
 18 A I recall Kesha bringing it up a lot. I
 19 think maybe when we first started working together
 20 on "Warrior" she had mentioned that she put on
 21 weight after her last tour cycle, and she was
 22 working on getting it off.
 23 She would talk about it with her manager,
 24 Monica. She would just openly talk about wanting to
 25 lose weight.

Page 62

1 Q Do you recall anyone other than Ms. Sebert
2 herself expressing that Ms. Sebert should lose
3 weight?

4 A No.

5 Q Did you ever hear Dr. Luke tell Ms. Sebert
6 that she should lose weight?

7 A No.

8 Q Did you ever hear Dr. Luke criticize
9 Ms. Sebert's weight?

10 A No.

11 If I may, if anything he was very
12 supportive. She was -- when I was working with her,
13 if I remember during the Malibu time, she was doing
14 different diets, maybe one for a week, maybe one for
15 two weeks.

16 She spoke to me about her frustrations
17 with not finding the right diet that worked or the
18 right trainer or the right exercise routine. You
19 know, she was open about struggling with it.

20 Me, myself, I was trying to lose weight
21 around the same time, and in some sort of solidarity
22 I thought: Let me help you.

23 I am not going to do carbs. So a lot of
24 times when we ate I'd, you know, order the same she
25 ordered. I was, you know, trying to help out in

Page 63

1 that sense. And she kept jumping to different diets
2 where I just stuck to my own. Yeah.

3 Q Mr. Gibbs, you testified that the
4 recording sessions for "Warrior" began at the Record
5 Plant; correct?

6 A Yes.

7 Q Where was the next place -- and then you
8 references several other places where the album was
9 recorded. Do you recall the next place it was
10 recorded?

11 A After the Record Plant would have been
12 Dr. Luke's Malibu studio.

13 Q And where -- is that studio located in his
14 home?

15 A Yes.

16 Q How would you describe the general working
17 environment during the recording sessions at
18 Dr. Luke's Malibu house for "Warrior"?

19 A It was a really good vibe. We -- Luke's
20 family was there. So it was sort of a big family
21 vibe. We ate lunches together, dinners together.
22 We'd just take breaks together. It was a happy
23 environment.

Page 64

7 Lagan often had a camera system with him.
8 Lagan was filming everything.

9 Monica would be there, Irene Richter,
10 myself, Katie Mitzell, who was personal assistant to
11 Dr. Luke, was there.

12 And then if we were working with --
13 producer Cirkut was there. If any other
14 producer/songwriters we were working with were
15 there, they were there.

16 Q During the -- during the recording
17 sessions at Luke's Malibu house for "Warrior" do you
18 recall any disagreements?

19 MR. LITTLE: Objection. Vague.
20 "Disagreements" as to what? Between whom?

21 BY MR. MOVIT:

22 Q During the Malibu recording sessions for
23 Kesha's "Warrior" album, do you recall any creative
24 disagreements?

25 MR. LITTLE: Objection. Same objection.

Page 65

1 Unless he's heard these questions before I can't
2 imagine he would know what her --

3 MR. MOVIT: Well, I reject that
4 characterization.

5 Q Do you -- during the recording sessions
6 for "Warrior" at Luke's Malibu house, do you recall
7 any disagreements regarding creative matters
8 involving Kesha and anyone else?

9 A Yes.

10 Q What do you recall about that subject?

11 A I recall an instance where I was working
12 with Kesha in the studio at the Malibu house.

13 Everyone was downstairs eating dinner.
14 Kesha was either skipping that dinner, or was on a
15 different type of meal plan then, and I skipped my
16 dinner and worked with her.

17 We were finishing up a song, and I don't
18 recall what song it was. Her and Monica were in the
19 room. When we completed that Kesha asked I pull up
20 a song called "Machine Gun Love," which was an idea
21 that she had recorded at the Record Plant. I played
22 it down one time.

23 Irene Richter came up, asked me to go
24 downstairs. I spoke with Dr. Luke. Dr. Luke
25 explained to me that we were here to finish the

Page 66

1 album, and that he really wanted her to focus on
2 songs that everyone knew were making the album. And
3 "Machine Gun Love" at the time wasn't one of those.

4 And so I understood that. I went back
5 upstairs and told Kesha: Hey, we can't work on
6 'Machine' -- we want to finish up this song we're
7 working on.

8 And her demeanor immediately changed, and
9 said something to the effect like: What the fuck?
10 This is my song," like: I can do what I want.

11 And I stayed in the room. She left
12 stormed out of the room, down the stairs, out the
13 front door towards PCH. I remember hearing it
14 slamming pretty hard, shaking the house a little
15 bit.

16 And I think she stayed in her car on PCH
17 for a little bit, and I don't remember her returning
18 to the session that night.

19 Q And for the record, "PCH" is the Pacific
20 Coast Highway?

21 A Yes.

22 Q Which is -- is that -- how close is the
23 Pacific Coast Highway to this house where Dr. Luke's
24 Malibu house was?

Page 67

1 Q During this incident did Dr. Luke flail
2 his arms?

3 A No.

4 Q Have you ever seen Dr. Luke flail his
5 arms?

6 A No.

7 Q During this incident did Dr. Luke act
8 violently?

9 A No.

10 Q Have you ever seen Dr. Luke act violently?

11 A No.

12 Q During this incident did Dr. Luke yell?

13 A No.

14 Q Have you ever heard Dr. Luke yell?

15 A No.

16 Q Who else was there during this incident at
17 the house in which Ms. Sebert left, went out on the
18 Pacific Coast Highway, besides yourself, Irene,
19 Kesha and Dr. Luke?

20 A Monica would have been there. And then
21 everyone else you listed. I don't think there was
22 anyone else in attendance that day.

23 Q Where was the next place that the
24 "Warrior" album was recorded, following the sessions
25 at Dr. Luke's Malibu house?

Page 68

1 A During the stay at Malibu we went to
2 Nashville, at Kesha's request. She wanted to work
3 on some songs in her hometown. I think she had
4 chosen to work at Blackbird, so we went and worked
5 there.

6 Q What is Blackbird?

7 A That's a recording studio in Nashville,
8 Tennessee.

9 Q How long do you recall the sessions
10 lasting in Nashville?

11 A We were there five to seven days.

12 Q Do you recall how the general environment
13 was during the Nashville recording sessions?

14 A Yeah, I remember it being really great. I
15 think she enjoyed being on home turf, being able to
16 show us around her city. She really wanted to set
17 up a barbecue at her house with all of us.

18 We didn't -- the barbecue didn't happen,
19 but we did go over for I think evening appetizers,
20 snacks. She showed us around her house. She had to
21 try on her tour clothes.

22 And we were just having a real goofy time,
23 just sort of hanging out and playing her piano and
24 taking pictures in her tour costumes and just really
25 great vibes.

Page 69

1 And that's -- after that is when they all
2 went to a strip club, and I went back to my hotel.

3 And, yeah, it was great. I worked a lot
4 with Kesha and Pebe and Kojak in a room, and did a
5 few songs that Pebe wrote with Kesha.

6 For me personally, it was, you know,
7 really enjoyable experience working at a studio like
8 that, and recording really good musicians and the
9 gear. And it was -- it was like a vacation from the
10 album, but we were still working.

11 Q During the Nashville sessions, do you
12 recall any incidents of behavior by Kesha that were
13 consistent with her public persona, as you have
14 described it?

15 A Yes. I remember -- I think we had alcohol
16 in the sessions. I remember her pouring whiskey
17 into Kojak's beard and drinking out of it.

18 She -- I had -- by this point of the album
19 I had a big beard. I was growing a beard out for
20 her during these sessions. And she loved scratching
21 it, and sort of like make me feel a little
22 uncomfortable in the rooms.

23 And another time she came in talking about
24 that she had sex last night. You know, I am not
25 sure if it was -- I don't remember explicit details,

Page 70

1 but she had mentioned something to the effect that:

2 Oh, I feel good today. I had sex last night.

3 And then I guess her being drunk at the
4 hotel, and that seemed like a Kesha thing to me.

5 Q Where was the next place that the
6 "Warrior" album was recorded following Blackbird?

7 A We went back to Malibu to work. I don't
8 remember if Kesha was coming all those days, or if
9 we were working on production. But we may have done
10 a few more days, little more time in Malibu.

11 Q Was any recording done in any locations in
12 Malibu, other than Dr. Luke's house?

13 A Yes, at this place Studio Malibu.

14 Q What work on the album was done there?

15 A Final vocal recording. I think it was
16 pretty close to the end there, and it was a lot of:
17 What do we still need to get? Yeah.

18 MR. MOVIT: Would you read back that last
19 answer, please.

20 (The record was read.)

21 BY MR. MOVIT:

22 Q How was the general environment at the
23 Studio Malibu working with Kesha?

24 A It was good. I would say it was focused.
25 I think finishing up the album, everyone was -- I

Page 71

1 think there may have been a deadline at that point.

2 So I mean it was a little more: Let's go to work.

3 But good overall.

4 Q During the recording sessions for
5 "Warrior" did Kesha seem comfortable around Dr. Luke
6 or uncomfortable around Dr. Luke?

7 A She was comfortable.

8 Q And you had said Pebe Sebert was present
9 for some of the recording sessions for "Warrior."

10 A Yes.

11 Q Okay. Who is Pebe Sebert, for the record?

12 A Kesha's mom.

13 Q Did Pebe Sebert appear comfortable or
14 uncomfortable around Dr. Luke?

15 A She seemed comfortable.

16 Q Was Pebe Sebert present for the earlier
17 recording sessions with Dr. Luke prior to the
18 recording of the "Warrior" album on earlier
19 projects?

20 A Best of my memory I saw her at Conway
21 during the "Animal" and "Cannibal" sessions.

22 Q Do you recall during those sessions
23 whether Ms. Pebe Sebert seemed comfortable or
24 uncomfortable around Dr. Luke?

25 A From what I can remember, Pebe seemed

Page 72

1 comfortable.

2 Q Do you remember any conversations at any
3 point in time regarding the issue of how many songs
4 Pebe Sebert would co-write for a Kesha album?

5 A I do not.

6 Q Do you recall ever observing anyone
7 preventing Pebe Sebert from co-writing with Kesha?

8 A Yes. I remember Kesha at times being in
9 the room saying, "Can we not have my mom here
10 today?"

11 Or when she would leave the room, like,
12 "oh, I wish she wasn't here today. I wish we'd just
13 finish this."

14 That's all I remember of Pebe not --
15 someone asking Pebe not to be involved.

16 Q Do you recall Dr. Luke ever asking Pebe
17 not to be involved in co-writing --

18 A No.

19 Q -- with Kesha?

20 A No.

21 Q Following the recording of the "Warrior"
22 album did you ever see Kesha again in person?

23 A Yes.

24 Q Okay. When was that?

25 A End of 2012, early 2013, I had met up with

Page 73

1 her twice, I believe, to play her the album off an
2 iPod.

3 Q Did you ever see Kesha again after that?

4 A One moment. I'm just scanning my brain
5 here. It was just those two times, playing her the
6 album.

7 Q Okay. For the "Warrior" album did Kesha
8 ever express what her creative vision was for the
9 album?

10 A Yes.

11 Q And what did she express her creative
12 vision for the album as being?

13 A Yes, I think when she finally came in
14 started working at the Record Plant, we met in one
15 of the recording studios with Dr. Luke, Cirkut,
16 Kesha, Rainey Hancock, Monica, myself. Pebe may
17 have been there. I don't remember exactly.

18 Yeah, it was a creative talk. I remember
19 Kesha saying -- describing what she wanted the album
20 to sound like. "I want, you know, big rock guitars,
21 rock sensibilities, glitter, lasers. You know,
22 new -- new sound, but also appeal to my fan base."

23 Q Do you know what she meant by "lasers"?

24 A I like to -- what I think she meant by
25 lasers, it is just electronic sounds, noises, that

Page 74

1 go make a laser noise: Bew.

2 I have seen her live before, and she has
3 lasers a lot, and I just -- people describe music
4 visually often, and I think she may have been,
5 metaphorically speaking I want lasers, but, you
6 know, just look like lasers somehow.

7 Q Do you have any understanding what
8 Ms. Sebert meant by -- Ms. Kesha Sebert meant by she
9 wanted the music to sound like glitter?

10 A Yeah, to me that meant being herself. I
11 think glitter is very much part of her identity.
12 And I think, you know, pop music has a glitter to
13 it. Maybe just another descriptive word.

14 Q How did Dr. Luke and the production team
15 respond to Kesha's creative vision for the album?

16 A I remember everyone being very on board:
17 Okay, let's start making music, and, you know, tell
18 us what you like, what you don't like, and let's
19 keep going.

20 (A discussion was held off
21 the written record.)

22 MS. SMITH: You swing back and forward in your
23 chair. Maybe if you stop that will help with the
24 chord.

25 MR. MOVIT: Katherine, might it be -- I see

Page 75

1 your necklace. Might it be your necklace hitting on
2 the microphone?

3 THE WITNESS: It's tough when the cord comes up
4 from the middle to not interact with that --

5 MS. SMITH: I'm happy to take it off in the
6 name of --

7 THE WITNESS: There we go. I'll do that.

8 MS. SMITH: -- experimentation.

9 All right. Let us know, please, if it
10 happens again.

11 BY MR. MOVIT:

12 Q Mr. Gibbs, were you finished with your
13 answer?

14 A Yes.

15 (Speaking simultaneously.)

16 MS. SMITH: Do you want to have it read back --

17 THE WITNESS: Please --

18 BY MR. MOVIT:

19 Q You want her --

20 THE REPORTER: We're speaking at the same time.

21 (The record was read.)

22 BY MR. MOVIT:

23 Q Do any portions of the album reflect
24 Kesha's creative vision for "Warrior"?

25 A Personally I would say "Warrior" is an

Page 76

1 exact offering of what she wanted.

2 If you listen to the album there are a lot
3 of guitars, and when we were in Nashville we
4 recorded the best guitars through the best amps in,
5 you know, one of the best rooms in the country
6 probably. By "room" I mean live recording room.

7 There are songs on there that I feel
8 appeal to her fan base. I think there are songs on
9 there that are a new sound.

10 She had a banjo player play on the song --
11 on the song -- it will come to me -- and during the
12 session we funny enough found out that that banjo
13 player lived in Pebe's basement at one point. And
14 so that was a real cool thing that sort of naturally
15 happened.

16 We called the guy next door, I think:
17 Hey, come play banjo on this, and it was that.

18 But going back to the album, there is a
19 song "Dirty Love" that is a straight up, I think,
20 rock 'n roll song.

21 And, you know, she wanted guests on the
22 album, reputable guests. She mentioned not having,
23 you know, pop star guests. So Iggy Pop was on it
24 Slash from Guns N Roses was going to do a guitar
25 solo but did not. Her friend Patrick, from the

Page 77

1 Black Keys who is a rock band, played on it.

2 And, you know, I was very proud of the
3 album. I think everyone was very proud of the
4 album. I think Kesha was proud of the album. And I
5 think it reflects exactly creatively what she was
6 trying to do at that time.

7 BY MR. MOVIT:

8 Q Have you ever observed anyone forcing
9 Kesha to sing anything against her will?

10 A No.

11 Q Have you ever witnessed anyone force Kesha
12 to do anything against her will?

13 A No.

14 May I add, I don't think anyone can be
15 forced -- no one had a gun to anyone's head to sing
16 anything. You know, if someone didn't want to sing
17 something, you just don't sing it. You walk out of
18 the booth.

19 Q Did you ever hear Dr. Luke tell Kesha that
20 he could make her sing anything using computers
21 because he had enough of her vocals saved from prior
22 recordings?

23 A No.

24 Q Have you ever heard anyone yell at Kesha?

25 A No. I have heard Kesha yell at people.

Page 78

1 Q Are you familiar with a song called "Die
2 Young"?

3 A Yes.

4 Q Do you know who the recording artist of
5 that song is?

6 A It's Kesha.

7 Q Do you know, is that song on any of
8 Kesha's albums?

9 A Yes, it's on "Warrior."

10 Q Okay. Are you aware of any controversy
11 regarding that song, subsequent to its release?

12 A Yes.

13 Q Okay. What is that controversy?

14 A I'm aware that after the Sandy Hook
15 shooting a lot of radio stations pulled the song.
16 And then Kesha went on a radio show, and
17 from what I remember said that, "I didn't want to
18 record that song," and that "I didn't write it,"
19 and, "The label made me record it."

20 Q Do you know if the label made her record
21 "Die Young"?

22 A No. And from my memory, that song, it was
23 brought to everyone at the Malibu house. Benny
24 Blanco brought it in from a member of the group Fun,
25 who wrote the song, and from my memory wrote the

Page 80

1 Q What did you hear about that subject?

2 A We were working together one time at the
3 Record Plant in the upstairs room called Digiplant,
4 and she said something to the effect that she was --
5 said something to the effect that, asking me if I
6 knew if it was connected with aliens.

7 She went on to explain to me how she
8 thought she was related to aliens to some degree,
9 whether -- some weird lineage, and then she had
10 e-mailed me two links for further reading.

11 Q So Pebe Sebert, did she say she was
12 descended from space aliens?

13 A Yes, something to the effect that aliens
14 had come and mated with humans, and she's a line of
15 that race.

16 Q In your experience, when things didn't go
17 Kesha's way during recording projects, how would she
18 handle it?

19 A I found she would go to pouting. She
20 would get quiet, not approachable, seemed like she
21 was throwing a tantrum at times.

22 Q Previously you said that you heard Kesha
23 yell. Who do you recall hearing Kesha yell at?

24 A Yes. And to clarify, not yelling by
25 berating anyone, but she would yell for Monica or

Page 79

1 chorus lyrics, which the radio station had problems
2 with.

3 I recall Kesha hearing it for the first
4 time, and getting really excited and saying, "That's
5 my song. I want that song."

6 And, yeah, I think everyone, when they
7 heard that song, thought this was good first single.

8 MR. MOVIT: Take a quick break.

9 THE VIDEOGRAPHER: Going off the record at
10 2:42 p.m. This is the end of disc No. 1, end of
11 disc 1.

12 (A recess was taken from
13 2:42 p.m. to 4:02 p.m.)

14 THE VIDEOGRAPHER: We're on the record,
15 beginning disc No. 2 in the deposition of Clinton
16 Gibbs. The time is 4:02 p.m.

17 Counsel, you may proceed.

18 BY MR. MOVIT:

19 Q Mr. Gibbs, are you aware of Kesha Sebert
20 recording any music at Dr. Luke's Malibu home prior
21 to 2012?

22 A No.

23 Q Mr. Gibbs, have you ever heard Pebe Sebert
24 discuss the subject of space aliens?

25 A Yes.

Page 81

1 Nicole, her assistant, "Go get my bag," or like,
2 "Get me this," or -- that's the yelling I heard.

3 MR. MOVIT: Alex, if could you please keep the
4 noise down. There has been a lot of snickering on
5 the record. I don't know if the record is picking
6 it up, rather, but I hear it.

7 MR. LITTLE: This is video conference, for the
8 record. So I'm sure the video camera has a
9 microphone.

10 MR. MOVIT: Well, I certainly hear it, and it
11 is distracting.

12 Q Did Kesha seem comfortable when she talked
13 about sexual matters?

14 A Yes, very much.

15 Q Did you ever hear anyone give advice to
16 Kesha on what she should or should not eat?

17 A Yes.

18 Q Who?

19 A Monica would talk about it often, whether
20 it was straying from her diet plan or not. Pebe had
21 mentioned something when we were in Nashville when I
22 was in the room. I can't remember what exactly we
23 ordered in, but Pebe said something to the effect
24 of: Don't eat that.

25 Q So Pebe told Kesha not to eat something?

Page 82

1 A Yes.

2 Q Did Dr. Luke ever comment on what Kesha

3 should or should not eat, in your presence?

4 A No.

5 Q Did Kesha ever -- did you ever hear Kesha

6 discuss the subject of how the media treated her?

7 A Yes.

8 Q What do you recall Kesha saying on that

9 subject?

10 A I recall her saying that she thought the

11 media was unfair to her, that they picked on her. I

12 remember an incident where nude photos were

13 online -- or a nude photo.

14 She just would complain often about the

15 media picking on her. You know, it felt like

16 bullying, and I know she didn't like it.

17 Q Did Dr. Luke -- do you know if Dr. Luke

18 did anything to address the media situation?

19 A From what I understand Dr. Luke helped

20 remove a graphic image of Kesha with her top up that

21 was posted on Perez Hilton. And, yes, to my

22 understanding, Dr. Luke helped get that down.

23 Q Have you ever had a physical fight with

24 Dr. Luke?

25 A No.

Page 84

1 treats her with a lot of respect.

2 Q Did you ever hear Pebe Sebert complain to

3 you about Dr. Luke?

4 A No.

5 Q Did you ever hear Pebe Sebert complain

6 about Dr. Luke?

7 A No.

8 MR. MOVIT: All right. Obviously we reserve

9 the right to Redirect, but the Direct Examination is

10 finished.

11 Thank you very much, Mr. Gibbs.

12 Alex, as I said, I have to take a call at

13 4:30. If you want to start your Cross before then,

14 the witness can stay late, as can we.

15 (A discussion was held off

16 the written record.)

17 MR. MOVIT: We're on the record.

18 I just wanted to say that to reduce chaos

19 on the record, Alex, you agree that I'll incorporate

20 any objections that Katherine makes.

21 MR. LITTLE: Sure.

22

23

24

25

Page 83

1 Q Have you ever seen Dr. Luke have a

2 physical fight with anyone?

3 A No.

4 Q Have you ever seen Dr. Luke physically

5 abuse anyone?

6 A No.

7 Q Have you ever had a verbal fight with

8 Dr. Luke?

9 A No.

10 Q Have you ever seen Dr. Luke get into a

11 verbal fight with anyone?

12 A No.

13 Q Has Dr. Luke ever yelled at you?

14 A No.

15 Q Have you ever seen Dr. Luke yell at

16 anyone?

17 A No.

18 Q Have you spent a lot of time with

19 Dr. Luke's family?

20 A Yes.

21 Q Have you observed his relationship with

22 his domestic partner?

23 A I have.

24 Q How would you describe that relationship?

25 A Loving. They are very close, and he

Page 85

1 EXAMINATION

2 BY MR. LITTLE:

3 Q Good afternoon, Clint.

4 A Hello.

5 Q Mr. Gibbs. Do you have a preference about

6 how I refer to you?

7 A No.

8 Q Okay. Thank you. My name is Alex Little,

9 and I represent Pebe and Kesha Sebert in this matter

10 in a related case.

11 Do you understand that?

12 A I do.

13 Q Okay. Could you describe in general terms

14 your relationship with Kesha Sebert.

15 A General relationship with her is a working

16 relationship, and I don't know her personally now.

17 Q Was there a time you did know her

18 personally?

19 A To the degree that we communicated, yeah.

20 Q Would you consider yourself friendly at

21 that time?

22 MS. SMITH: Objection to the form. What time?

23 BY MR. LITTLE:

24 Q At the time when you had a working

25 relationship.

Page 86

1 A I would say at one point we were near
2 possibly being friends.
3 Q Okay. During that time was Kesha nice to
4 you?
5 A Yes, for -- yes, for the most part.
6 Q Were you nice to her?
7 A Yes.
8 Q Okay. Her behavior towards you, which you
9 described as nice for at least some period of time,
10 was she also like that with other people she
11 interacted with, in the recording studio?
12 MR. MOVIT: I'm going to object to the
13 question. I don't quite understand it.
14 BY MR. LITTLE:
15 Q You can answer.
16 A Can you repeat it one more time, please.
17 Q Yeah. So you have described -- testified
18 there was a time when Kesha was nice to you during
19 the period you were friendly.
20 I'm asking you whether you also observed
21 her being nice to other people in the recording
22 studio.
23 A Yes.
24 Q Besides the circumstances you previously
25 described in your Direct testimony, is there any

Page 87

1 circumstances you can recall in which Kesha was not
2 nice to someone that you observed?
3 A My observation how she treated Monica, I
4 wouldn't say it was respectful or nice.
5 Q So besides that interaction?
6 A How she treated her personal assistant,
7 Nicole.
8 Q And how would you describe that?
9 A I would describe it as demanding. You
10 know, I didn't hear a lot of "please" and "thank
11 you."
12 Q Was it common to hear "please" and "thank
13 you" from artists in the recording studio?
14 A From my experience, yes.
15 Q From all of them besides Kesha?
16 A I would not say from all of them. From my
17 experience I use "please" and "thank you."
18 Q Sure. What other artists do you recall
19 also being rude in that manner, not saying "please,"
20 not saying "thank you," being demanding in the way
21 you have described Kesha acting towards her personal
22 assistant.
23 MR. MOVIT: I don't see this as a relevant
24 inquiry.
25 MR. LITTLE: It's a question he needs to

Page 88

1 answer.
2 THE WITNESS: May you repeat it, please?
3 (Speaking simultaneously.)
4 MR. LITTLE: Yeah, I don't think --
5 MR. MOVIT: I just want to state for the record
6 before Mr. Gibbs answers, I think asking this line
7 of questioning about other artists is not
8 appropriate.
9 MR. LITTLE: I appreciate that.
10 MS. SMITH: I'm going to join in the objection,
11 and also note that the other artists would have a
12 right to privacy in that regard, and I am not sure I
13 see the relevance to this inquiry either.
14 MR. LITTLE: If you all wish to mark that
15 portion of the transcript Confidential, we can
16 certainly talk about doing so.
17 THE WITNESS: I would need the question
18 explained a little better. How you are wording it
19 is confusing me.
20 BY MR. LITTLE:
21 Q Sure. You have made a series of answers
22 about never having heard something, or never having
23 experiencing something.
24 You also gave an answer on Direct about
25 the way that interacting with Kesha in certain

Page 89

1 matters made you feel.
2 Do you recall general questions about how
3 things that Kesha did made you feel?
4 A Yes.
5 Q Do you recall those questions --
6 A Yes --
7 Q Okay. And so I'm going to begin to ask
8 you some questions that go to the question how rare
9 that was that you felt that way. Was it unique for
10 you to feel uncomfortable? Was it unique for you to
11 feel upset by the way an artist acted in your
12 working relationship with them in the studio?
13 Do you understand that background?
14 A Yes.
15 Q Okay. With that background, are there any
16 other artists that you recall working with who you
17 found to be rude in the way they behaved in the
18 studio?
19 MR. MOVIT: Note my objections. Also outside
20 the scope of Direct, which was about sexual and
21 scatological behavior, not about being not nice.
22 MS. SMITH: I'll join in the objection, and
23 also object to the form of the question.
24 BY MR. LITTLE:
25 Q You can answer the question.

Page 90

1 A I'd like to answer your question, but I'm
2 still having a hard time directing the answer to
3 what you're asking.
4 Q Okay. Are there any other artists that
5 you can recall behaved in a manner which you believe
6 to be rude when they were in the studio in a manner
7 in which you could observe them?
8 MS. SMITH: Same objections.
9 MR. MOVIT: Same objection.
10 THE WITNESS: To the best of my knowledge, no.
11 Kesha was a unique person I worked with.
12 BY MR. LITTLE:
13 Q So to be clear, your testimony is that
14 Kesha was the only artist you observed in the studio
15 act in a rude manner?
16 MS. SMITH: Objection. It's asked and
17 answered. And it is argumentative.
18 MR. MOVIT: And it misstates the testimony.
19 BY MR. LITTLE:
20 Q You can answer.
21 A Ask me one more time, please.
22 Q So to be clear from your testimony, Kesha
23 is the only artist that you worked with who you
24 believed to be rude in the manner in which she
25 behaved in the studio?

Page 92

1 BY MR. LITTLE:
2 Q Did you ever observe any other
3 individuals, whether it be managers, recording,
4 engineers, producers, who acted rudely in the
5 recording studio?
6 MS. SMITH: Same objection.
7 THE WITNESS: I have seen people act rude, but
8 not in this situation with who we're discussing.
9 BY MR. LITTLE:
10 Q Okay. But there are other examples of
11 rudeness you have seen in the studio, in your
12 career?
13 MR. MOVIT: Asked and answered.
14 MR. LITTLE: Previously he said no. I'm now
15 asking he said yes. I'm asking for clarification.
16 MS. SMITH: Okay. Objection. You're
17 misstating prior testimony. The question is
18 argumentative, and it is asked and answered several
19 times.
20 BY MR. LITTLE:
21 Q Would you please give us an answer.
22 A Yeah, I'd like to. The way you are asking
23 things is a bit confusing, and doing my best to
24 answer you truthfully right now.
25 I'll add that I worked in a recording

Page 91

1 MS. SMITH: Same objections.
2 THE WITNESS: Yes. Kesha is the only artist to
3 have flirted with me, made any sort of sexual
4 advances, ever tried to show me a dick pic. No
5 other artist I have ever worked with has ever done
6 anything like that or anywhere near that.
7 BY MR. LITTLE:
8 Q That wasn't my question. I asked you
9 whether or not you observed an artist being rude.
10 A I have not observed another artist being
11 rude.
12 (Reporter clarification.)
13 BY MR. LITTLE:
14 Q I understand that you have never observed
15 another artist being rude in the studio.
16 A Best of my knowledge, no --
17 MR. MOVIT: Asked and answered.
18 BY MR. LITTLE:
19 Q Besides artists, any people affiliated in
20 the recording process, such as engineers, producers,
21 managers, acting rude that you observed?
22 MS. SMITH: I do object to the form of the
23 question.
24 THE WITNESS: Repeat it one more time.
25 ///

Page 93

1 studio. I have seen people be rude. No one
2 directed, in the making of the Kesha albums or my
3 interactions with Kesha and her team, Dr. Luke's
4 team, anyone that I have seen, rude experiences have
5 been totally removed from this situation.
6 Q Okay. What are you describing as "the
7 situation"? What do you mean by that term?
8 A The works -- us working with Kesha. So I
9 have seen, you know, the recording studio manager
10 get upset over a tree getting cut down at his
11 garden. It had nothing to do with anything we have
12 talked about today.
13 So I have seen someone who was at a
14 recording studio be rude to someone. I hope I'm
15 answering your questions.
16 Q You are.
17 And let me ask about that. You have never
18 heard my questions before today, have you?
19 A No.
20 Q Okay. But the questions that Mr. Movit
21 was asking, you had heard those questions before
22 today, had you not?
23 MS. SMITH: I'm going to object. It calls --
24 on the grounds that the question calls for
25 information protected by the attorney-client

Page 94

1 privilege, the attorney work product doctrine and
2 joint defense privilege, and I'm going to instruct
3 the witness not to answer.

4 MR. LITTLE: So to be clear, you have a joint
5 defense agreement with Dr. Luke?

6 MS. SMITH: You can direct that question to me.
7 Kemosabe Records, which employs the witness, has a
8 joint defense agreement with Dr. Luke.

9 MR. LITTLE: Okay. And so you're also going to
10 assert that during your breaks when you have been
11 conferring with MSK you have been doing so pursuant
12 to that privilege?

13 MS. SMITH: That statement, one, lacks
14 foundation, and, two, to the extent that we have
15 been conferring with attorneys from MSK, those
16 conferences would be protected by the joint defense
17 privilege.

18 BY MR. LITTLE:

19 Q So you're not really a third party here;
20 correct, as far as you know?

21 MS. SMITH: Objection. To the form of the
22 question. Calls for a legal conclusion. You can
23 answer it, if you understand it.

24 THE WITNESS: Ask one more time, please.
25 ///

Page 95

1 BY MR. LITTLE:

2 Q Well, you're employed by Kemosabe Records;
3 correct?

4 A Correct.

5 Q Okay. And you understand that Kemosabe
6 Records has some connection to the lawsuits that
7 you're here to be deposed about today?

8 A Correct.

9 Q What is that connection, as you understand
10 it?

11 MR. MOVIT: Object. It calls for a legal
12 conclusion.

13 THE WITNESS: I'd be speculating. I don't
14 know -- I don't know how to answer that.

15 MR. LITTLE: I'm asking what you know.

16 MR. MOVIT: Objection --

17 THE WITNESS: I know they are involved.

18 BY MR. LITTLE:

19 Q Okay. How do you know they are involved?

20 MS. SMITH: Okay, I'm going to object to that
21 on the grounds that it is calling for the witness to
22 divulge information protected by the attorney-client
23 privilege and the joint defense doctrine -- or the
24 joint defense privilege.

25 And we will instruct the witness not to

Page 96

1 answer, to the extent that the witness knows the
2 answer through conversations with counsel.

3 BY MR. LITTLE:

4 Q What do you know about the ongoing
5 litigation between Kesha and Dr. Luke?

6 MS. SMITH: I'm going to repeat my instruction.
7 To the extent that -- and caution the witness not to
8 divulge any information that you got from lawyers,
9 any conversations that you have had with any
10 lawyers.

11 THE WITNESS: What I know of this case?

12 BY MR. LITTLE:

13 Q Yes.

14 A Is what I see on Twitter, media. That's
15 the extent of it. Which I think anyone who watches
16 the media, that they are going to know the same.

17 Q Okay. So based on that information, what
18 is your understanding of what these cases are about?

19 MR. MOVIT: Could you define "these cases"?

20 MR. LITTLE: The cases where Kesha and her
21 mother are in lawsuits with Dr. Luke.

22 THE WITNESS: Can you -- to be honest can you
23 describe the cases. I don't know them really with
24 any detail.

25 ///

Page 97

1 BY MR. LITTLE:

2 Q That's fine. That's what I'm asking for,
3 is what do you know -- without me telling you what
4 these cases are about, what do you know about these
5 cases?

6 A I'd like to say, again, everything I know
7 about these cases is what I have read in the media,
8 see on Twitter, and that's it.

9 Q And was it that that you know about these
10 cases from in the media and Twitter?

11 A My honest answer to that is I don't know.
12 There is so much noise I feel like that goes on in
13 the media. To be honest, I don't know really
14 what --

15 Q Can you not recall what you read in the
16 media and on Twitter?

17 MS. SMITH: Okay. Objection --

18 MR. LITTLE: He's not answering a very
19 straight-forward question. If he's got -- I'll ask
20 it six ways until he answers it.

21 MS. SMITH: He's answered the question --

22 MR. LITTLE: He's answered what he knows about
23 the case? Can we -- we can go back through his last
24 four answers if you think he's answered that
25 question.

Page 98

MS. SMITH: I made my objection. You can answer the question.

BY MR. LITTLE:

Q Based on all these sources, in the media and what have you, what do you know about these lawsuits?

A I do not recall what I have read in the media about these lawsuits.

Q So sitting here today you know nothing about what these lawsuits are about?

MS. SMITH: Objection. Asked and answered. You're being argumentative.

MR. LITTLE: I'm just impressed that an individual who works at Kemosabe Records doesn't know what these cases are about.

MS. SMITH: Okay, Counsel --

MR. LITTLE: I mean, it's impressive --

MR. MOVIT: The colloquy --

MS. SMITH: That's --

MR. MOVIT: -- is inappropriate.

MS. SMITH: Highly inappropriate.

MR. LITTLE: We will move on.

Q Why are you here today, as far as you know?

MR. MOVIT: I'm going to object to the form

Page 99

of -- I'm going to object to the question to the extent it calls for information protected by the joint defense privilege.

I assume Katherine is going to object, to the extent it calls for attorney-client privilege divulged information --

MS. SMITH: I am --

(Reporter clarification.)

MR. LITTLE: Just for the record, is MSK going to be -- it's your understanding that MSK will be able to make attorney-client objections on the basis of a joint defense agreement for this client?

MS. SMITH: I will be making the attorney-client privilege objections for this client.

MR. LITTLE: And so that objection by Mr. Movit would not be an objection on the basis of attorney-client privilege.

MR. MOVIT: I said joint defense privilege, I said.

MR. LITTLE: Well, I understand that is an attorney-client privilege objection.

MR. MOVIT: We can have a theoretical legal discussion another day. Mr. Gibbs is here to testify --

Page 100

MR. LITTLE: I'd like to make the record --

MR. MOVIT: -- as to --

(Reporter clarification.)

MR. LITTLE: I'd like to make the record clear as to what the objection was that Mr. Movit was making.

MR. MOVIT: I raised a concern that the answer to the question called for joint defense privileged information.

MR. LITTLE: And as we go forward, my question is will MSK be making an attorney-client privilege objection on behalf of this witness?

MR. MOVIT: I am not being deposed here. Ask questions of the witness, Mr. Little.

MR. LITTLE: You're not willing to put that on the record?

MS. DICKERSON: It looks like Christine has something to say.

MS. LEPERA: I am not supposed to be talking, but let me tell you this doesn't really make any sense.

There is a joint defense privilege between Kemosabe Records, Kasz Money, and all the other parties that your client is adverse to. When they communicate, those are privileged communications.

Page 101

Why are you not respecting that and just moving on?

MR. LITTLE: I'm just asking, trying to make sure the objection is clear as to what the objection is. It's an objection from MSK about privilege. That's all.

MS. LEPERA: Whether it is through MSK -- I thought the point was just to have one lawyer object. And it is the same -- it gets you to the same place. Okay. There are attorney-client privileged communications if they are done as part of a joint defense agreement, what is the difference?

Moving on, please.

MS. SMITH: If I may, first of all, we very much appreciate the reporter, who is doing the best job she can, and let's all try to speak individually.

And in the meantime, I think that I was spoken over. I would like to say for the record that I am, for the purposes of this record, whenever Mr. Movit objects, I'm joining in his objection.

I will make every effort to invoke the attorney-client privilege and joint defense privilege, where appropriate.

Page 102

1 I have no memory of what the question was.
2 We better have it read back, so that I can make the
3 appropriate objection and instruction --

4 BY MR. LITTLE:

5 Q It was: Why are you here today?

6 MS. SMITH: "Why are you here today?" Okay. I
7 will instruct the witness that he may answer the
8 question, but should not divulge any conversations
9 that you have had with attorneys, with myself or
10 Mr. Movit or any other attorneys at MSK or any
11 others attorneys with Kemosabe Records.

12 THE WITNESS: That is privileged.

13 BY MR. LITTLE:

14 Q Okay. Did you receive a subpoena to be
15 here today?

16 A No.

17 Q Okay. Did you ever receive a subpoena for
18 documents in this case?

19 A Can you please describe "subpoena,"
20 actually. I need clarification.

21 Q Yes. A subpoena is a document that has
22 the court caption at the top, and it requests -- it
23 orders you, under the power of the court, to produce
24 certain documents to the party making that request.

25 Have you ever received a document of that

Page 103

1 sort, related to this matter?

2 MS. SMITH: I object to the form.

3 THE WITNESS: I believe that may be privileged.

4 MS. SMITH: You can answer. I mean, if you
5 have seen such a document, you can answer that you
6 have.

7 THE WITNESS: I have not received a subpoena.

8 BY MR. LITTLE:

9 Q Okay.

10 MR. MOVIT: Alex, as I said, I have a call at
11 4:30.

12 MR. LITTLE: You want to break now? Okay,
13 that's fine.

14 THE VIDEOGRAPHER: Going off the record at
15 4:27 p.m.

16 (A recess was taken from

17 4:27 p.m. to 4:51 p.m.)

18 THE VIDEOGRAPHER: We are back on the record at
19 4:51 p.m. Counsel, you may proceed.

20 BY MR. LITTLE:

21 Q Good afternoon, again, Mr. Gibbs.

22 A Hello.

23 Q So without divulging any of the statements
24 that you made or that counsel made to you, have you
25 met with anyone in preparation for your deposition

Page 104

1 today?

2 A Yes.

3 Q Okay. Approximately how many times did
4 you do that?

5 A One time on Monday, one time on Tuesday,
6 briefly this morning.

7 Q Okay. Where were those sessions?

8 THE WITNESS: Is that privileged?

9 MS. SMITH: You can answer the question. Just
10 answer the question specifically.

11 THE WITNESS: Here.

12 BY MR. LITTLE:

13 Q The offices of MSK?

14 A Offices of MSK.

15 Q Okay. For all three of those sessions?

16 A Correct.

17 Q Okay. We will start with Monday. How
18 long did you meet on Monday?

19 MS. SMITH: I'm going to object to the
20 question, and -- I'm going to object to the question
21 on the grounds that it asks for attorney work
22 product.

23 MR. LITTLE: I think we're entitled to know how
24 long he prepared for these depositions. It goes to
25 his preparation, it goes his truthfulness. And I

Page 105

1 think the case law is pretty clear we can ask
2 questions not related to communications.

3 MS. SMITH: Okay, I'm going to allow the
4 witness to answer the question.

5 THE WITNESS: Monday, maybe two hours.

6 BY MR. LITTLE:

7 Q And how long was your session on Tuesday?

8 A Same.

9 Q Two hours?

10 A Correct.

11 Q Okay. And how long was your session on
12 this morning?

13 A 30 minutes.

14 Q Okay. We will start with Monday. Your
15 two-hour session preparing for this deposition on
16 Monday, who was present?

17 A Katherine, Jeff, Gabby.

18 Q Anybody else?

19 A No.

20 Q Okay. Anyone else participate by
21 telephone or video conference?

22 A Christine on telephone.

23 Q And on Tuesday were those same individuals
24 present?

25 A No.

Page 106

1 Q Who was present Tuesday?
 2 A Tuesday was Jeff and Gabby.
 3 Q Okay. Katherine was not present Tuesday?
 4 A No.
 5 Q And was Christine present on Tuesday?
 6 A No.
 7 Q And then this morning, which parties were
 8 present for your preparation of this testimony?
 9 A Katherine, Jeff, Gabby.
 10 Q Was Christine participating via phone or
 11 video conference that morning?
 12 A No.
 13 Q Did you -- again, without telling me what
 14 is in them, did you prepare any notes in preparation
 15 for this deposition today?
 16 A I did not.
 17 Q Okay. Were you shown any documents in
 18 preparation for this testimony today?
 19 A I was.
 20 Q Okay. Yeah, so the documents that you
 21 looked at in preparation for this, did that include
 22 the documents that you were shown here today marked
 23 as Exhibit --
 24 MS. SMITH: One.
 25 ///

Page 108

1 A I told her that it was regarding the
 2 lawsuit versus Kesha and Dr. Luke.
 3 Q Okay. And from your communications she
 4 understood what that meant?
 5 MS. SMITH: Objection to the form.
 6 BY MR. LITTLE:
 7 Q Did you have explain to her what that
 8 meant, or did she know what that meant?
 9 A She knew what that meant.
 10 Q Okay. Did you discuss with her at all any
 11 questions you believed you were going to be asked?
 12 A No.
 13 Q Did you discuss with her anything you
 14 believed you were going to say at the deposition?
 15 A No.
 16 Q So the full extent of her knowledge, based
 17 on your communications with her, was that you were
 18 coming to a deposition?
 19 A Correct.
 20 Q Okay. With respect to Dr. Luke -- well,
 21 let me ask first with your fiance -- and
 22 congratulations.
 23 A Thank you.
 24 Q -- how many times did you talk to her
 25 about this deposition?

Page 107

1 BY MR. LITTLE:
 2 Q -- 1?
 3 A Yes.
 4 Q Okay. Were there documents besides
 5 Exhibit 1 that you were shown during these meetings?
 6 A No.
 7 Q Okay. And to be clear, before today you
 8 have never spoken to myself or any lawyers
 9 representing Kesha or Pebe?
 10 MR. MOVIT: Object to foundation.
 11 THE WITNESS: No.
 12 BY MR. LITTLE:
 13 Q So besides your lawyers who else knew that
 14 you were coming to this deposition?
 15 A Dr. Luke, my fiance. That would be it.
 16 Q Okay. Let's talk about your fiance. What
 17 did you tell her about why you were coming today?
 18 A I told her I would be most likely missing
 19 dinner tonight; I was getting deposed for the Kesha
 20 Dr. Luke lawsuit.
 21 Q And what did you tell your wife the
 22 lawsuit was about?
 23 MS. SMITH: Objection --
 24 BY MR. LITTLE:
 25 Q Sorry, your fiance.

Page 109

1 A Twice.
 2 Q When did those conversations take place?
 3 A When I found out I was requested to come,
 4 and this morning when I told her I didn't know when
 5 I would be home.
 6 Q Late for dinner. When is the first time
 7 that you -- yeah, when is the first time that you
 8 learned you were going to have to be here at all?
 9 (Reporter clarification.)
 10 BY MR. LITTLE:
 11 Q When did you know you were going to have
 12 to be here at all? Approximately what date?
 13 A Last week.
 14 Q Do you know middle of the week, end of the
 15 week, anything of that sort?
 16 A I don't recall.
 17 Q Okay. And you stated that you also spoke
 18 with Dr. Luke about having to be here to be deposed;
 19 is that correct?
 20 A Yes.
 21 Q How many times did you speak with him
 22 about that subject?
 23 A Twice.
 24 Q When did those conversations take place?
 25 A One time last week, one time yesterday.

Page 110

1 Q Okay. Let's start with last week. With
2 respect to Dr. Luke, who brought up the topic of
3 this deposition, you or him?

4 A I did.

5 Q Okay. And what did you say to him?

6 THE WITNESS: Am I divulging privileged
7 information if I say --

8 MS. SMITH: As long as you're not
9 communicating --

10 MR. LITTLE: I would ask that he directed to
11 answer the question. You can make an objection, if
12 you think it's appropriate. He's been asked a very
13 direct question. He needs to answer it without
14 coaching.

15 MS. SMITH: You keep interrupting me. I'd
16 appreciate it if you didn't do that. It's not
17 professional. It doesn't make for a clear record.

18 MR. LITTLE: And it's equally unprofessional to
19 be coaching a witness. He's been asked a direct
20 question. He needs to answer it before he is told
21 what to say.

22 MS. SMITH: He's asking about the scope of the
23 attorney-client privilege. If you're saying that I
24 cannot tell my client, who is asking whether this
25 question implicates the attorney-client privilege,

Page 111

1 then that's surprising to me, Counsel.

2 MR. LITTLE: I think it is very clear that it
3 is not implicating a privilege, and I would expect
4 that to be the answer.

5 MS. SMITH: There is a joint defense privilege
6 between Dr. Luke and his entities and the witness'
7 employer.

8 To the extent that they were communicating
9 at the direction of counsel, or communicating things
10 that were learned in the scope of that joint
11 defense, that would be privileged.

12 I don't believe that's the case, but I'm
13 going to instruct the witness not to divulge
14 anything that may have been said in this
15 conversation with Dr. Luke that you learned from
16 attorneys.

17 THE WITNESS: May you ask your question one
18 more time?

19 BY MR. LITTLE:

20 Q Yes. First, who brought up the topic of
21 the deposition, you or Dr. Luke? That was the
22 original question.

23 A I did.

24 Q Okay. And what did he say in response --
25 well, sorry, let me strike that, and start first

Page 112

1 with: What did you say specifically to him?

2 MS. SMITH: I'm going to give the same
3 instruction.

4 THE WITNESS: I said I was getting deposed in
5 this case, and I would be missing some work.

6 BY MR. LITTLE:

7 Q And what did he say in response?

8 MS. SMITH: Same instruction.

9 THE WITNESS: He said, "Thank you, and that's
10 okay to miss work."

11 BY MR. LITTLE:

12 Q Did you talk to him at all about the
13 subject of the deposition?

14 A I did not.

15 Q Did you talk to him about any questions
16 you expected to be asked?

17 A I did not.

18 Q And did he mention anything about the
19 topics that would be discussed in the deposition?

20 A He did not.

21 Q Who else was present for this
22 conversation?

23 A No one.

24 Q Where did it take place?

25 A At one of the houses where we're working

Page 113

1 at right now.

2 Q And how long was it from the time you
3 learned about having to come to the deposition to
4 the time that you spoke to Dr. Luke about it?

5 A Maybe half a day.

6 Q Same day?

7 A Yes.

8 Q Not half a day overnight, but same day?

9 A Half a day on the same day.

10 Q Okay. So the second conversation you had
11 with Dr. Luke, you said that took place Tuesday?

12 A Yes.

13 Q Okay. And to be clear, I'm talking about
14 the second conversation you had with Dr. Luke that
15 took place Tuesday related to this deposition.

16 We're on the same page?

17 A I understand.

18 Q Okay. Where did that conversation take
19 place?

20 A Phone call.

21 Q Who called who?

22 A I called Dr. Luke.

23 Q When did you call Dr. Luke?

24 A Maybe it was 7:30 p.m.

25 Q Okay. Was that before or after you met

Page 114

1 with lawyers to prepare for the deposition for your
2 Tuesday session?

3 A That would be after.

4 Q Okay. What did you tell Dr. Luke about
5 this deposition?

6 MS. SMITH: I'm going to give the same
7 instruction that you should not divulge anything
8 that you learned from attorneys.

9 THE WITNESS: We didn't -- the extent we
10 discussed the deposition, was that I'll be
11 missing -- reminding him I'll be missing the whole
12 day Wednesday.

13 I think we had a song needed to be sent
14 out to mix. I said, "Do you need me to send that?"

15 He said, "No."

16 I said, "All right. Thanks. I'll talk to
17 you later."

18 Q And did Dr. Luke make any comments about
19 the deposition?

20 A He did not.

21 Q Did you tell him that you had met with the
22 lawyers that day?

23 A Yes.

24 Q Okay. Did you tell him how long you had
25 met with the lawyers that day?

Page 115

1 A No.

2 Q Okay. And in telling him that you met
3 with the lawyers, you did not talk about the subject
4 of the deposition?

5 A No.

6 Q Okay. Was that your last contact with him
7 before today?

8 A Yes --

9 MR. MOVIT: About anything?

10 MR. LITTLE: Yes, about anything.

11 THE WITNESS: Yes.

12 BY MR. LITTLE:

13 Q Okay. How do you communicate with
14 Dr. Luke generally?

15 A We text, phone calls, and I'm with him a
16 large part of the day, so one on one.

17 Q Personal conversations as well?

18 A Yes.

19 Q Okay. When you say text messages, you
20 have your own cell phone I presume?

21 A Yes.

22 Q And Dr. Luke does as well?

23 A Yes.

24 Q And so when you're saying text message,
25 you're texting from your phone to his phone, as far

Page 116

1 as you know?

2 A Yes.

3 Q What sort of phone do you have?

4 A An iPhone.

5 Q And how long have you had that?

6 A This specific phone? Hmm. Maybe a year.

7 Q Okay. Have you had iPhones before this
8 specific phone?

9 A Yes.

10 Q Just the best you can approximate, I am
11 not going to hold you to it, approximately how many
12 iPhones have you had in succession?

13 A Three.

14 Q Three? Okay. Do you know -- and you may
15 not, but you have testified about some technical
16 things -- do you know whether you have always backed
17 up your iPhone in that progression from the first
18 time you had an iPhone to the last time you had an
19 iPhone?

20 MR. MOVIT: Could you read that question back,
21 please.

22 (The record was read.)

23 MR. MOVIT: I'm going to object to the question
24 as vague and confusing.

25 ///

Page 117

1 BY MR. LITTLE:

2 Q You can answer it.

3 A I have backed up iPhones before. I don't
4 have a memory of my backup schedule.

5 Q Okay. Well, let me ask this. You have
6 produced as Exhibit 1 some text messages.

7 A Yes.

8 Q Which iPhone did that come out of?

9 A My current phone.

10 Q Okay. And if you'll look, I think the
11 front page of Exhibit 1, there is a date there on
12 the front; correct?

13 A Yes.

14 Q And that date is April 22nd, 2012, is it
15 not?

16 A Yes --

17 MS. SMITH: What -- what date did you say?

18 MR. LITTLE: April --

19 MS. SMITH: 27th.

20 MR. LITTLE: 27th, I'm sorry. Reading upside
21 down.

22 Q April 27th, 2012; correct?

23 A Correct.

24 Q Okay. And so based on that document do
25 you believe you have other text messages from around

Page 118

1 the same time in 2012?

2 A I'd be speculating without knowing for
3 certain. I am not sure.

4 Q Okay. But the phone you have now you're
5 using, and you have printed those from, or you
6 screenshotted those from, it was not purchased in
7 2012; correct?

8 A No.

9 Q Okay. Yet these text messages are on your
10 current phone?

11 A Yes.

12 Q Okay. While we have that out, very
13 quickly, the top of that document has a "K\$." Do
14 you see that portion of the document?

15 A I do.

16 Q Okay. Who put that information into your
17 phone?

18 A I did.

19 Q Okay. And to be clear, what we're looking
20 at is essentially what you'd see on the screen when
21 you pull up messages, text messages?

22 A Correct.

23 Q And generally that portion of the screen
24 is reserved for either a telephone number or a
25 contact name. Is that your understanding?

Page 119

1 MS. SMITH: Which portion?

2 BY MR. LITTLE:

3 Q The portion where it says "K\$."

4 A Excuse me, just repeat that, please.

5 Q Yeah. Is it your understanding that the
6 portion here on the document where it says "K\$" is
7 the portion on a phone screen that would display
8 either a telephone number or a contact name?

9 MR. MOVIT: I'm going to object that this
10 witness hasn't been qualified to have knowledge of
11 iPhone technology.

12 MR. LITTLE: It's his phone.

13 THE WITNESS: Yes.

14 BY MR. LITTLE:

15 Q And if you were not to have a contact in
16 your phone, and you got a text message, would it
17 come up with a name of a person or come up with a
18 phone number?

19 A Phone number.

20 MR. MOVIT: Same objection to that last
21 question.

22 BY MR. LITTLE:

23 Q Do you have enough knowledge about iPhones
24 to know whether or not that's true?

25 A Repeat what are you asking.

Page 120

1 Q Do you have enough knowledge about iPhones
2 to know whether or not they work in the manner you
3 have just described?

4 MR. MOVIT: Objection --

5 THE WITNESS: Yes.

6 BY MR. LITTLE:

7 Q So the "K\$," to the best of your knowledge
8 was placed into the iPhone by yourself, you wrote
9 that in?

10 A I typed that in.

11 Q Yeah. And so instead of displaying a
12 phone number, it is not clear -- there is no phone
13 number that is depicted on this exhibit; correct?

14 A There is not. No.

15 Q And to find a phone number, based on what
16 you have here -- correct me if this is your
17 understanding -- you'd have to go to the contact in
18 your phone labeled "K\$" and look for that phone
19 number associated with that contact name.

20 A Yes.

21 Q And do you believe at this time you would
22 be able to go back to your phone, look at that
23 contact in your phone labeled "K\$" and determine
24 what number it was associated with these text
25 messages?

Page 121

1 MS. SMITH: Objection to the form.

2 BY MR. LITTLE:

3 Q Do you believe you'd be able to find in
4 your phone the phone number associated with the
5 contact "K\$"?

6 A Yes.

7 Q How would you do that?

8 A I would hit "Details," and it would come
9 up.

10 Q Okay. On the screen of the phone?

11 A On the screen of the phone.

12 Q Thank you. That was all about that
13 document.

14 Do you know whether or not you have -- do
15 you know whether or not you have saved text messages
16 between yourself and Mr. Gottwald?

17 THE WITNESS: May I ask my counsel about
18 something? Is that a privileged conversation?

19 MR. LITTLE: I'm asking whether he kept them.

20 MS. SMITH: The question is whether -- can you
21 repeat the question?

22 BY MR. LITTLE:

23 Q Yeah. Do you keep your technicians with
24 Dr. Gottwald on your phone -- with Mr. Gottwald on
25 your phone?

Page 122

1 MS. SMITH: You can answer.
 2 THE WITNESS: To the best of my knowledge, I
 3 have a text history.
 4 BY MR. LITTLE:
 5 Q Okay. Do you have any reason that you
 6 would have deleted texts -- do you have any
 7 knowledge of deleting text messages between yourself
 8 and Dr. Luke?
 9 MR. MOVIT: Time period?
 10 BY MR. LITTLE:
 11 Q During the time that you have had your
 12 cell phones.
 13 A I do not.
 14 MS. SMITH: Wait, was the question your cell
 15 phones?
 16 MR. LITTLE: Yeah, because he's had multiple
 17 cell phones.
 18 MS. SMITH: Well, over the course of his whole
 19 life?
 20 MR. LITTLE: No, the time of having iPhones.
 21 MS. SMITH: Which we haven't established.
 22 Okay. I just want to make sure he's giving you the
 23 right answer --
 24 MR. LITTLE: Sure, sure.
 25 MS. SMITH: So --

Page 124

1 BY MR. LITTLE:
 2 Q No, that's not a question. I was putting
 3 it on the record.
 4 A Excuse me --
 5 Q I'm just putting that on the record --
 6 A Excuse me, may I refill my mug real quick?
 7 Q Of course. Take two minutes.
 8 THE VIDEOGRAPHER: Going off the record at
 9 5:10 p.m.
 10 (A discussion was held off the record.)
 11 THE VIDEOGRAPHER: We are back on the record at
 12 5:11 p.m. Counsel, you may proceed.
 13 MR. LITTLE: Thank you.
 14 Q So we have talked about text messages
 15 between yourself and Dr. Luke. You have also
 16 mentioned in your testimony working with other
 17 producers, like Kojak and Ammo.
 18 Do you recall that testimony generally?
 19 A I do.
 20 Q Have you ever communicated via text
 21 message with those individuals, Ammo, Kojak?
 22 MR. MOVIT: The question is limited to those
 23 two individuals?
 24 BY MR. LITTLE:
 25 Q For now.

Page 123

1 BY MR. LITTLE:
 2 Q So --
 3 MS. SMITH: -- say the question again. Thank
 4 you.
 5 BY MR. LITTLE:
 6 Q You have no knowledge of deleting any text
 7 messages between yourself and Dr. Luke since you
 8 have had an iPhone?
 9 A I do not.
 10 Q Okay. And so to the best of your belief,
 11 all the text messages you have communicated between
 12 yourself and Dr. Luke would still be saved in the
 13 history, unless it was out of your control?
 14 MS. SMITH: On the iPhones?
 15 BY MR. LITTLE:
 16 Q On the iPhones we have talked about.
 17 MR. MOVIT: I'm going to object. Foundation.
 18 THE WITNESS: Correct.
 19 MR. LITTLE: We will ask you at the end,
 20 through counsel, to preserve any text messages and
 21 not to delete them in the future. I'll just put
 22 that on the record.
 23 Through your counsel we will ask you not
 24 to delete any of those from this point forward.
 25 MS. SMITH: You don't have to answer that.

Page 125

1 A Yes.
 2 Q Okay. Are there other producers who you
 3 have worked with, with Dr. Luke and Kesha, who you
 4 also have communicated via text message with?
 5 A Yes.
 6 Q Who would those be, to the best of your
 7 recollection?
 8 A Best of my recollection, Benny Blanco,
 9 Cirkut.
 10 Q So those four individuals we'll talk about
 11 them just specifically, as a group, the four
 12 individuals Benny Blanco, Cirkut, Kojak and Ammo.
 13 Do you have any reason to believe you
 14 would have deleted text messages that you had
 15 between any of those four and yourself, during the
 16 time that you have had an iPhone?
 17 A No.
 18 Q Okay. Do you generally make it a practice
 19 to delete text messages?
 20 A No.
 21 Q Okay. Again, this is not a question. We
 22 will ask you similar to preserve those sorts of
 23 similar text messages in the future.
 24 A May I clarify? I delete Uber text
 25 messages --

Page 126

1 Q Oh, sure. I just asked about those four.
 2 I understand you may delete others --
 3 A I understand.
 4 Q We're trying to limit this and keep it
 5 specific.
 6 We have talked briefly about
 7 communications with your fiance and Dr. Luke about
 8 the deposition.
 9 With respect to your fiance, have you ever
 10 talked to her about the lawsuit in general, between
 11 Dr. Luke and Kesha and Pebe?
 12 A Yes.
 13 Q Okay. Approximately how many times have
 14 you spoken to her about that?
 15 A Once or twice.
 16 Q How long have you been engaged?
 17 A Since last October 16th.
 18 Q Okay. And before that how long were you
 19 together? Do you recall when you first began
 20 dating?
 21 A April 2013.
 22 Q Okay. So that would have been before, to
 23 the best of your knowledge, before these lawsuits
 24 began? You were --
 25 A Best of my knowledge, yes.

Page 128

1 Q Appreciate it --
 2 (Reporter clarification.)
 3 BY MR. LITTLE:
 4 Q Just so the record is clear, I think the
 5 clarification is at the time you spoke with her she
 6 was your fiance and not just your girlfriend.
 7 A Yes.
 8 Q And we haven't put her name in the record,
 9 so I'm referring to her as "fiance" and
 10 "girlfriend."
 11 A Thank you.
 12 Q Does that make sense? So when I just say
 13 "fiance" that will refer to her at all times. Is
 14 that fair?
 15 A That is fair.
 16 Q Okay. Do you recall the first time you
 17 spoke to her about the lawsuit?
 18 A Not a clear memory.
 19 Q Okay. Do you recall doing so in general?
 20 A In general, yes.
 21 Q Okay. What, if any, comments did you make
 22 to her about the lawsuit?
 23 MS. SMITH: I'm going to object to the form of
 24 the question. Also object that this is really
 25 private conversations between the witness and his

Page 127

1 Q Okay. Do you recall having any
 2 conversations with your then girlfriend about the
 3 initiation of these lawsuits?
 4 A Repeat that one more time, please.
 5 Q Do you recall having any conversation with
 6 your then girlfriend about the initiation of these
 7 lawsuits?
 8 A Then girlfriend?
 9 Q Who is now your fiance?
 10 A Yeah --
 11 MR. MOVIT: I'm going to -- could you read the
 12 question back?
 13 (The record was read as follows:
 14 "Q Do you recall having any
 15 conversation with your then
 16 girlfriend about the initiation of
 17 these lawsuits?")
 18 MR. MOVIT: I'm going to object to the
 19 question. Not sure what it means, "the initiation
 20 of the lawsuits."
 21 THE WITNESS: Just to clarify, when I spoke to
 22 her we were engaged.
 23 BY MR. LITTLE:
 24 Q Oh, okay. Understood.
 25 A Not girlfriend then --

Page 129

1 fiance. I will let the witness answer.
 2 THE WITNESS: Repeat your question, please.
 3 BY MR. LITTLE:
 4 Q Yeah. What, if any, comments did you make
 5 to your fiance about this lawsuit?
 6 A I thought that the -- it was ridiculous.
 7 Everything we saw in the media was mostly what we
 8 talked about, from reading death threats on Twitter
 9 from Kesha's fans, to our own discussions about my
 10 personal safety leaving the workplace at night and
 11 arriving.
 12 We talked about we had both seen death
 13 threats on Twitter towards Dr. Luke, and we have
 14 discussed ways for me to keep my head up. Because
 15 as we all know, people in this world do crazy
 16 things, and that's probably the extent of it.
 17 Q And is that emotionally difficult for you,
 18 those conversations?
 19 A Yes.
 20 Q And it sounds as if -- and I want to make
 21 sure this is clear for the record -- that the
 22 initiation of the lawsuit, when you first learned
 23 about it, was emotionally difficult for you?
 24 MS. SMITH: I'm going to object that it
 25 mischaracterizes his prior testimony. You can

Page 130

1 answer.

2 THE WITNESS: I'd like to --

3 BY MR. LITTLE:

4 Q I'll clarify that. How did it make you
5 feel, besides the conversations with your fiancé,
6 when you learned about these lawsuits?

7 A I felt they were unfounded and no basis in
8 my interactions with them, my time spent with them.

9 Q And who is "them" in that statement?

10 A Kesha, Dr. Luke.

11 Q Given these strong feelings --

12 MS. LEPERA: Before you guys keep going, you're
13 making a very confused record here, by the way.
14 Because there is three separate lawsuits.

15 You haven't established that he knows
16 one -- which one, so nice -- you're making a nice
17 confused record.

18 MR. LITTLE: Is that an objection for the
19 record?

20 MS. LEPERA: That is an objection for the
21 record that there is no foundation as to what
22 lawsuit you're even talking about.

23 BY MR. LITTLE:

24 Q Do you know anything about the procedural
25 history of these cases or of any case in particular

Page 132

1 best of my memory, either Los Angeles or New York.

2 Q Okay.

3 A Or Nashville.

4 Q Okay. And so do you have any particular
5 knowledge, particularly at the beginning of the time
6 we're talking about, 2015, you have just testified
7 you learned of these suits, as to which lawsuit,
8 maybe Nashville, maybe New York, maybe California,
9 you were reading about?

10 MS. SMITH: Object to the form --

11 MR. MOVIT: Could you read the question back,
12 please.

13 (The record was read as follows:

14 "Q Okay. And so do you have any
15 particular knowledge, particularly
16 at the beginning of the time we're
17 talking about, 2015, you have just
18 testified you learned of these
19 suits, as to which lawsuit, maybe
20 Nashville, maybe New York, maybe
21 California, you were reading
22 about?")

23 MR. MOVIT: Objection.

24 BY MR. LITTLE:

25 Q You can answer.

Page 131

1 between Dr. Luke and Kesha?

2 A Very minor.

3 Q Okay. What, if anything, do you know,
4 when we refer to "lawsuits between these parties"?

5 MS. SMITH: I'm going to object, and instruct
6 the witness to not divulge any attorney-client
7 conversations.

8 BY MR. LITTLE:

9 Q I just mean generally. I am not seeking
10 those sorts of communications.

11 A From the best of my memory, sometime 2015
12 I heard a report that there was a lawsuit in the
13 media. And then -- I'm so sorry, can you repeat
14 your question?

15 Q Yeah. I think we're going along that
16 line. So you heard there was a report in the media
17 about a lawsuit.

18 Do you know who that lawsuit was between,
19 to the best of your knowledge?

20 A Yes.

21 Q And who was that?

22 A Kesha, Dr. Luke and Kemosabe Records.

23 Q Do you know where that lawsuit was taking
24 place?

25 A If I had to -- I'd be speculating from the

Page 133

1 A When I learned about a lawsuit in the
2 media I don't have any memory of knowing which state
3 it was in, who the exact plaintiffs were. Yeah, I
4 don't recall exacts.

5 Q And how did reading about that lawsuit
6 make you feel?

7 MR. MOVIT: Objection. It's not even clear
8 what lawsuit we're talking about.

9 BY MR. LITTLE:

10 Q The lawsuit that you just referred to, how
11 did that make you feel?

12 A Again, I was surprised and didn't think it
13 had merit. And to clarify, I didn't know the
14 details of the lawsuits, I never read the lawsuits.
15 Most of my knowledge of the lawsuits comes from the
16 media and Twitter.

17 Q Okay. So let's talk about Twitter. You
18 said that you read some threats towards Dr. Luke.
19 Were those on Twitter?

20 A Those were on Twitter.

21 Q Okay. Do you recall what any of them were
22 in particular or the general outlines?

23 A Yes.

24 Q What was that?

25 A To clarify, I read these almost every day,

Page 134

1 and they are all, as Kesha has dubbed them,
2 "animals." They all have different Twitter handles,
3 "Kesha I Love" -- do I need to keep going?

4 Q No, just in general.

5 A I have seen tweets that say, "Woke up
6 today. Feel like -- feel like making a difference."
7 And it's a meme of someone cocking a gun.

8 I have seen: There would be nothing
9 better today than hear Dr. Luke is in the ground.

10 I just recently saw that the girl in
11 Orlando who was just shot, the singer, people on
12 Twitter were saying Dr. Luke killed her, and that we
13 should kill him.

14 I could literally go a long time with
15 this.

16 Q Okay, well, I want to stop you because I
17 think one of the things that you said -- and I want
18 to be clear -- you said you checked Twitter for
19 these sorts of things, really from the time the
20 lawsuit, as you know about it, began to the present;
21 is that correct?

22 MS. SMITH: Objection. You can answer.

23 THE WITNESS: Can you ask that one more time?

24 BY MR. LITTLE:

25 Q Yeah. Over what time period have you been

Page 135

1 reading about these threats?

2 A Since February 2016.

3 Q Why that date?

4 A I don't recall a specific. Something came
5 out in the media that Kesha was saying. Yeah, I
6 don't know specifically, but I do know we were
7 flooded with, you know, people tied to Luke abusive,
8 harassing messages, and he couldn't avoid it.

9 Q And did you at your Twitter -- do you have
10 an account on Twitter?

11 A I do.

12 Q What is that Twitter handle?

13 [REDACTED]
14 [REDACTED]

15 Q And approximately how long have you had
16 that Twitter account?

17 A Approximately three or four years.

18 Q Okay. Have people made threats to you via
19 that Twitter account?

20 A No --

21 MR. MOVIT: No, before Mr. Gibbs answers, this
22 is entirely outside the scope of the Direct, and
23 note my objection to this entire line of testimony.

24 MR. LITTLE: Thank you.

25 THE WITNESS: Maybe one time, but I don't

Page 136

1 recall it. It was something about my weight, but
2 that was it.

3 BY MR. LITTLE:

4 Q Okay. And what I -- if individuals are
5 not making threats on your Twitter account, how you
6 are finding these other threats generally?

7 MR. MOVIT: Same objection.

8 BY MR. LITTLE:

9 Q Where you are reading them?

10 A On Twitter.

11 Q I understand. And so would that be in
12 your timeline by searching for other people's
13 tweets?

14 MS. SMITH: Objection to the form.

15 BY MR. LITTLE:

16 Q Do you understand what a timeline is in
17 Twitter?

18 A I do.

19 Q Could you describe to us what that is.

20 A A timeline is a realtime feed of people
21 tweeting that you follow --

22 Q Okay.

23 A -- and promote in tweets.

24 Q Understood. And would you read those
25 threats in your timeline?

Page 137

1 MR. MOVIT: Objection.

2 THE WITNESS: Yes.

3 BY MR. LITTLE:

4 Q Are there other threats that you would
5 read that you would discover through other means?

6 MR. MOVIT: Objection.

7 THE WITNESS: Yes.

8 BY MR. LITTLE:

9 Q For example, how?

10 A If --

11 MR. MOVIT: Objection.

12 THE WITNESS: If you came across one in the
13 feed, then I would look it up myself to see who else
14 was talking -- making threats, death threats, or
15 anything else.

16 BY MR. LITTLE:

17 Q Stop you there. How would you do that?

18 MR. MOVIT: You don't stop the witness. If he
19 had more than say, don't stop the witness, Alex.

20 BY MR. LITTLE:

21 Q Go ahead.

22 A I would search Dr. Luke's Twitter handle.
23 I would also search Kesha's Twitter handle.

24 Q And in doing so you would read the
25 resulting tweets?

Page 138

1 A Yes.

2 Q Would you do the same sort of searches
3 with respect to any other social media?

4 MR. MOVIT: Note my continuing objection to
5 this irrelevant line of questioning. Entirely
6 outside the scope of Direct Examination.

7 MR. LITTLE: I'd ask that the objections be
8 nonspeaking.

9 Q You can answer that question.

10 A I am. No, I focused on Twitter.

11 Q Okay. Through these searches on Twitter,
12 did you learn information about the lawsuit, as it
13 has transpired, or the lawsuits, as you understand
14 them?

15 A No.

16 Q Okay.

17 A I just want to clarify. Anything I did
18 read about the lawsuits were from Kesha fans during
19 their hate speech, and I never took anything I read
20 from them to be truthful at all.

21 Q Do you know whether Dr. Luke tweeted any
22 information about the lawsuits during the period you
23 were paying attention on Twitter?

24 A Yes.

25 Q What, if anything, do you recall about

Page 139

1 those tweets?

2 THE WITNESS: Let me just ask my counsel, is
3 that privileged?

4 MS. SMITH: No. You can answer the question.

5 THE WITNESS: I recall him saying what he felt
6 about what was happening. I recall him saying that
7 he did not rape Kesha. I recall him saying his --
8 mentioning his love and respect for Kesha, how they
9 were brother and sisters. He mentioned his family
10 life, his three sisters, his mom, his relationship
11 with them, and mentioned that he had young children,
12 and that he hoped this would all get worked out in
13 court, in the legal.

14 BY MR. LITTLE:

15 Q Those same comments by Dr. Luke, have you
16 ever heard him make similar comments to you or when
17 you have been present?

18 A Yes.

19 Q Could you describe those.

20 MS. SMITH: I'm just going to instruct the
21 witness not to discuss anything that occurred in the
22 presence of lawyers, which I don't think would be
23 anything, but if it is, I'm going to give you that
24 instruction. But you can answer.

25 THE WITNESS: Understood, Katherine.

Page 140

1 After the initial February 2016 onslaught
2 of all the Twitter stuff, it was -- I remember I
3 went to him and asked, like: "Hey, man, this stuff
4 is crazy. Is any of this true?"

5 And that's when he answered, "No, it's not
6 true, and I would never do that."

7 And that was our discussion.

8 BY MR. LITTLE:

9 Q Did you ever talk to him about it again?

10 A No.

11 Q Let me ask this just to make clear. Have
12 you ever had a conversation with Dr. Luke when
13 lawyers were present?

14 A No.

15 Q Have you ever had a conversation with any
16 of the four producers we have mentioned: Ammo,
17 Cirkut, Benny Blanco or Kojak, when a lawyer was
18 present?

19 A No.

20 Q Besides that conversation you mentioned
21 when you asked Dr. Luke whether any of this stuff
22 was true, had you ever had any prior conversations
23 with him about any lawsuit between him and Kesha or
24 Pebe?

25 A No.

Page 141

1 Q When you first learned of the lawsuits,
2 approximately when was that?

3 MR. MOVIT: What lawsuits are you referring to?
4 BY MR. LITTLE:

5 Q Any lawsuit whatsoever regarding Dr. Luke
6 and Kesha, approximately when was that date?

7 A 2015. Early 2015, closest I can give you.

8 Q Okay. So between the time that you first
9 learned of the lawsuits that you were aware of, and
10 when you had a conversation with Dr. Luke in
11 February 2016, did you have any conversations with
12 him about Kesha?

13 A I'm so sorry, can you repeat that?

14 Q Between the time you learned about the
15 lawsuits, to the best of your knowledge in
16 February 2015, and the time that you asked Dr. Luke
17 in February of 2016 whether any of this information
18 was true, did you discuss Kesha with him in any
19 manner?

20 A I'd just like to clarify. I don't think I
21 said February 2015. I said early 2015 --

22 Q Early --

23 (Reporter clarification.)

24 THE WITNESS: Just to clarify, I didn't say
25 February 2015. I said early 2015. And you're

Page 142

1 asking if we have talked about --

2 BY MR. LITTLE:

3 Q Kesha in that time period between early
4 2015 and February 2016, approximately, when you said
5 you had a conversation with him and asked him
6 whether or not any of this information was true.

7 MS. SMITH: I'm going to object, that it
8 misstates the prior testimony.

9 THE WITNESS: And I don't recall any prior
10 conversations before February 2016.

11 BY MR. LITTLE:

12 Q Did you speak with anyone associated with
13 Kemosabe Records, after you learned of the lawsuits
14 in February 2016?

15 MS. SMITH: Other than -- oh, I guess you can
16 answer.

17 MR. MOVIT: Could you -- could you read the
18 question back, please.

19 (The record was read.)

20 MR. MOVIT: About anything?

21 BY MR. LITTLE:

22 Q About Kesha.

23 A Yes.

24 Q Okay. Who did you have those
25 conversations with?

Page 143

1 A Irene Richter.

2 Q And who is she?

3 A She works for Dr. Luke.

4 Q And what does she do?

5 A I don't know her exact job title. She is
6 an assistant, executive assistant.

7 Q She's an executive assistant for whom?

8 A Dr. Luke.

9 Q Okay. How many times did you speak
10 with -- is it "Irene"?

11 A You're correct.

12 Q How many times did you speak with her
13 about Kesha?

14 A Best of my memory, two or three times.

15 Q When, approximately, did you have those
16 conversations?

17 A Post February 2016 to maybe three weeks
18 ago.

19 Q Okay. We will start with the most recent
20 conversation.

21 A Uh-huh.

22 Q What, if anything, did you and Irene talk
23 with Kesha about?

24 A We talked about death threats, Dr. Luke's
25 phone number and e-mail leaked recently by a hacker

Page 144

1 who hacked Katy Perry. We -- our phone rang off the
2 hook. He was -- Dr. Luke was getting text messages,
3 death threats, 600 or more maybe that day.

4 So we talked about how crazy Kesha's fans
5 are, and how crazy that someone can let their fans
6 attack someone like that.

7 Q And what specifically did you say about
8 Kesha?

9 MR. MOVIT: Objection. Foundation --

10 MS. SMITH: Objection --

11 BY MR. LITTLE:

12 Q In that conversation.

13 A That we can't believe this is happening.
14 We knew her well at one point, and it was a shock to
15 me.

16 Q Did you make any statements about anger
17 towards her, in that conversation?

18 A I did not.

19 Q Did Irene make any conversation -- did
20 Irene in that conversation make any statement about
21 being angry at Kesha?

22 A Not that I recall.

23 Q Are you angry at Kesha as to the way these
24 lawsuits have transpired and resulted in death
25 threats?

Page 145

1 MS. SMITH: Objection. You can answer.

2 THE WITNESS: I would like to say that I don't
3 hate Kesha or harbor resentment towards her. I will
4 say I highly respected her at one time, and that if
5 any of her fans do find their way into my life
6 somehow and cause a problem, then I will have to be
7 asked that question again then.

8 BY MR. LITTLE:

9 Q But at present?

10 A Present, no.

11 Q Okay. You stated just now that you did
12 highly respect Kesha. Do you recall when you did
13 that?

14 MR. MOVIT: Objection. I don't understand the
15 question.

16 BY MR. LITTLE:

17 Q When did you respect her?

18 A When -- during "Warrior" we worked closely
19 together, and there were times when I did respect
20 her.

21 Q What did you respect about her as an
22 artist?

23 MR. MOVIT: Objection. Foundation.

24 THE WITNESS: I would say I respected her not
25 as much as an artist, but as a person.

Page 146

1 BY MR. LITTLE:

2 Q Okay.

3 A She did talk to me about her weight
4 issues. She talked to me about the media. I felt
5 like sometimes I was having a conversation with
6 someone I went to high school with.

7 I saw how she was struggling with media
8 bullying her. I saw how she was struggling with
9 losing weight, I was too at the time.

10 And I will go further to say, though, that
11 as much as I respected her at times, she did make me
12 uncomfortable at times.

13 Q Sure. Were those mutually exclusive in
14 your mind at the time?

15 MR. MOVIT: Object.

16 BY MR. LITTLE:

17 Q The feelings of both respect and
18 discomfort?

19 A I'd be speculating. I don't know what
20 Kesha thought of me.

21 Q No, I meant for you. Did you hold both
22 those thoughts in your mind at the same time, that
23 you were both made uncomfortable and yet respected
24 her?

25 MR. MOVIT: Time frame?

Page 148

1 part of that that made me really uncomfortable is I
2 had beard dandruff. I wear black, so she'd be
3 scratching, "I just love this beard, get in there,"
4 just snowing down on my shirt, all the while her
5 brother Lagan, who was filming a lot of this time
6 period of "Warrior," and in my head I'm like: Oh,
7 my God. I'm on camera. I'm snowing down my shirt."

8 And, you know, she was on -- not on top of
9 me, right next to me in there on the couch, and I
10 didn't feel comfortable just getting up, "No,"
11 leaving the room.

12 You know, at that time she was still the
13 client, I was still working, and I didn't want her
14 to feel like she couldn't be, you know, herself
15 around me.

16 And trying to think of other times she was
17 making me uncomfortable. When I shaved my beard --
18 because the longer -- the album went longer than I
19 had anticipated, and I came in, and she, I think was
20 joking, but it actually was hard to tell, was sort
21 of upset that I shaved it.

22 And she would talk about: You look better
23 with a beard. This is around the time she was
24 making fun of me about a KIA that I was looking at,
25 saying how "you're never going to get lady again if

Page 147

1 THE WITNESS: Time frame, please.

2 BY MR. LITTLE:

3 Q You can answer the question.

4 A I would say I started with more respect,
5 and the more she would aggressively flirt, harass at
6 times, the more -- the less I respected her, and --
7 yes.

8 Q What was it about Kesha's aggressive
9 flirtation that you disliked?

10 A My space being invaded. I was growing a
11 beard at the time. I know she like beards. And I
12 thought -- I told her: I'm going to grow my beard
13 out, like a playoff beard, like a hockey playoff
14 beard. I am not going to shave until the album is
15 done.

16 And she always commented on my beard like,
17 "Oh, it's hot." You know, I would blush, and in a
18 working environment with fellow producers, engineers
19 to have the artist single you out in my position was
20 new. And so at the same time she was saying: Oh,
21 you look hot in a beard, I was also -- didn't enjoy
22 the attention in the room being brought to me when,
23 you know, I'm there to record, and not, you know,
24 have the artist flirt with me.

25 She loved scratching my beard, and the

Page 149

1 you get a KIA."

2 And, yeah, her aggressive flirtatiousness,
3 that's that.

4 Q Did anyone at the recording studio, in the
5 process of recording that album, besides the two of
6 you comment to you about her flirtation with you?

7 A Yeah.

8 Q Who?

9 A Kojak.

10 Q What, if you can recall, did Kojak say to
11 you about that topic?

12 A I'm going back to the time when we were in
13 Nashville. I had gone downstairs to open the door
14 for them coming back from the strip club. It was
15 after-hours. They locked the door. I just went and
16 greeted them.

17 That's when Kesha leaned out the car and
18 was saying, "Let me come up to your room."

19 And Kojak, you know, helped me say no, and
20 sent her on her way back home. And so Kojak and I
21 may have exchanged a, "Oh, man, yeah, she's on
22 tonight," or "She's drunk."

23 That would be the extent of our discussion
24 about that.

25 Q Do you know whether Kojak had ever had a

Page 150

1 romantic relationship with Kesha?
 2 A I am not aware.
 3 Q Are you aware of any other producers we
 4 have mentioned: Ammo, Benny Blanco, Kojak or Cirkut
 5 ever had any romantic or physical contact with
 6 Kesha?
 7 MR. MOVIT: Compound. And "physical contact"
 8 could mean all sorts of things.
 9 BY MR. LITTLE:
 10 Q Romantic contact.
 11 A No.
 12 Q To your knowledge.
 13 A To my knowledge.
 14 Q Okay. And just ask you, you just
 15 mentioned this one comment that was made about the
 16 Nashville incident when Kesha was, to your mind,
 17 drunk.
 18 Were there any other comments that anyone
 19 else you worked with made about her flirting with
 20 you?
 21 A Not that I recall.
 22 Q Did you make any comments to anyone that
 23 you worked with about Kesha flirting with you at the
 24 time?
 25 A I don't recall telling anyone.

Page 152

1 things were today.
 2 MS. SMITH: Okay. I'm going to instruct the
 3 witness -- would you mind rephrasing your question
 4 to exclude attorney-client privileged
 5 communications?
 6 MR. LITTLE: Yeah, sure.
 7 MS. SMITH: Thank you.
 8 BY MR. LITTLE:
 9 Q Besides -- we will kind of walk through
 10 them one by one. That might be easier.
 11 You have described an incident where Kesha
 12 played with your beard.
 13 Do you recall that testimony generally?
 14 A I do.
 15 Q Okay. Besides communications with
 16 lawyers, when is the first time you have told anyone
 17 about that incident?
 18 A Today.
 19 Q Okay. With respect to the incident in
 20 Nashville where Kesha appeared to be drunk and asked
 21 if she could come up to your room, besides
 22 conversations with lawyers, when is the first --
 23 when is the first time you recall telling anyone
 24 about that incident, besides your conversation at
 25 that moment with Kojak?

Page 151

1 Q Okay. And I want to make it clear, in
 2 addition to people you worked with, did you make
 3 comments to anyone, family, friends or otherwise, at
 4 the time about Kesha flirting with you?
 5 MR. MOVIT: What do you mean by "at the time"?
 6 BY MR. LITTLE:
 7 Q At the time these incidents were taking
 8 place.
 9 A I don't recall specific conversations.
 10 Not to say I never did. I just can't recall any
 11 right now.
 12 Q When is the first time that you can recall
 13 mentioning to anyone these incidents?
 14 MS. SMITH: Objection. You can answer.
 15 MR. MOVIT: And it's vague.
 16 BY MR. LITTLE:
 17 Q We can go through them one by one.
 18 A Today.
 19 Q Okay. You didn't mention any of these
 20 incidents on Monday?
 21 MS. SMITH: Okay. Now you're asking for
 22 attorney-client privileged conversation.
 23 BY MR. LITTLE:
 24 Q I just want to make sure you are
 25 100 percent sure that the first time mentioned these

Page 153

1 A From what I can remember, I only talked to
 2 Kojak about that. I don't recall if that next day I
 3 talked to anyone else about it. It's quite a while
 4 ago, and I honestly don't recall.
 5 Q At the time those two incidents happened
 6 were you dating anyone?
 7 A I was not.
 8 Q Okay. Have you told your fiance about
 9 either of those incidents?
 10 A I don't think I have.
 11 Q Okay. With respect to Exhibit 1 and the
 12 text correspondence between -- you have testified
 13 between yourself and Kesha, besides talking about
 14 that text correspondence with counsel, is there any
 15 time -- when is the first time you can recall
 16 telling anyone about that text exchange?
 17 MR. MOVIT: Other than Kesha?
 18 THE WITNESS: I believe my answer might be
 19 privileged.
 20 BY MR. LITTLE:
 21 Q I'm asking for a date.
 22 MS. SMITH: You can give a date.
 23 MR. MOVIT: Wait. Is this a date -- could you
 24 read back the question, please --
 25 MS. SMITH: You have carved out attorney-client

Page 154

1 communications -- let's have the question read back.

2 (The record was read.)

3 THE WITNESS: I think that's privileged.

4 MS. SMITH: Okay.

5 BY MR. LITTLE:

6 Q I'm going to ask you again. If your
7 counsel objects, and says it is privileged you
8 cannot answer.

9 When is the first time you discussed that
10 text message exchange in Exhibit 1 with anyone
11 besides counsel?

12 MS. SMITH: I'm going to instruct you not --
13 can we take a break to talk through this?

14 MR. LITTLE: Sure, yeah.

15 MS. SMITH: Let's do that. Let's go talk in
16 the hall.

17 THE WITNESS: Okay.

18 THE VIDEOGRAPHER: Going off the record at
19 5:44 p.m.

20 (A discussion was held off the record
21 outside from 5:44 p.m. to 5:53 p.m.)

22 THE VIDEOGRAPHER: We are back on the record at
23 5:53 p.m.

24 Counsel, you may proceed.

25 MR. LITTLE: Would you please read back the

Page 155

1 last question.

2 (The record was read as follows:

3 "Q I'm going to ask you again.

4 If your counsel objects, and says
5 it is privileged you cannot answer.

6 When is the first time you
7 discussed that text message
8 exchange in Exhibit 1 with anyone
9 besides counsel?")

10 THE WITNESS: I believe that's confidential or
11 privileged.

12 MS. SMITH: Well, was there a first
13 conversation that you had that maybe --

14 THE WITNESS: Yes.

15 MS. SMITH: -- was not privileged?

16 THE WITNESS: Yes.

17 MS. SMITH: You can testify to that.

18 THE WITNESS: Okay. I came across it in my
19 phone. It wasn't even --

20 MS. SMITH: I'm going to stop you right there.
21 I think there might be just a little -- you all can
22 stay on the record even. I just think there is a
23 little bit of confusion.

24 MR. LITTLE: Let's go off the record.

25 THE VIDEOGRAPHER: Going off the record at

Page 156

1 5:54 p.m.

2 (A discussion was held off the record
3 outside from 5:54 p.m. to 5:54 p.m.)

4 THE VIDEOGRAPHER: We're back on the record at
5 5:54 p.m. Counsel, you may proceed.

6 BY MR. LITTLE:

7 Q Mr. Gibbs, do you understand the question?

8 A Yes.

9 Q What is your answer?

10 A First correspondence I had about this text
11 message was with Kesha after I returned from picking
12 up the food order. She had come downstairs, and
13 sort of smiled at me, and, like, something to the
14 effect of: Did you like any of those pictures?
15 Which I said "No," and we didn't discuss it further
16 after that.

17 Q Okay. When is the next date you saw those
18 text messages on your phone?

19 A I don't know exact date. I believe it was
20 a week or two ago.

21 Q And were you the ones to make the
22 screenshots of those photos?

23 A I did.

24 Q Okay. And how did you come upon them in
25 your phone?

Page 157

1 MR. MOVIT: Object to the form of the question.
2 I am not sure I understand it. And then also when?

3 BY MR. LITTLE:

4 Q How did you discover them on your phone?

5 A I had scrolled to the bottom of my text
6 lists of people I have corresponded with. As I was
7 scrolling through I saw that text message contact,
8 and that's when I saw it.

9 Q Okay. And did you read it at that time,
10 those messages in Exhibit 1?

11 A Yes.

12 Q Okay. You have before you just Exhibit 1,
13 and it is nine pages. Can you turn to the last
14 page, please.

15 To the best of your knowledge are there
16 any further text communications in this same text
17 message string?

18 A No.

19 Q Turn to the first page. That first text
20 message, "Wiener," is that, to the best of your
21 knowledge, the first text message in this text
22 message string?

23 A Yes.

24 Q Do you know whether on any other phones or
25 any other -- strike that.

Page 158

1 Do you know whether there are any other
2 text messages at all between you and Kesha on your
3 phone presently?

4 A No.

5 Q Do you have an e-mail account?

6 A I do.

7 Q What is that e-mail account, personal use?

8 A Personal use?

9 Q Yes.

10 MS. SMITH: I'm going to object that it calls
11 for private and confidential information. Can we
12 maybe lay some foundation, as to whether there is
13 any relevance of that account.

14 BY MR. LITTLE:

15 Q Do you have a personal e-mail account?

16 A I do.

17 Q Do you use it to communicate with friends
18 and family?

19 A Friends and family?

20 Q Yes. Do you use it to communicate with
21 friends and family?

22 A Yes.

23 Q Do you ever use that e-mail account to
24 communicate with people you work with?

25 A No.

Page 160

1 to determine what his e-mail address is to see
2 whether he has any e-mails in any of the vast
3 discovery here.

4 We can mark this confidential. We have
5 that ability. We have --

6 MR. MOVIT: Alex, why don't you ask questions
7 to establish whether there is any relevance to the
8 communications sent through that account.

9 MR. LITTLE: I have just done that.

10 MR. MOVIT: And he's testified that he didn't
11 send work e-mails through --

12 MR. LITTLE: Yes, and he has talked about
13 having conversations with family and friends about
14 the matter, as we have discussed today.

15 MR. MOVIT: In e-mail?

16 MR. LITTLE: No. But he ability to search for
17 that. That's part of discovery. That's what we do.
18 We look. And I think that's clearly relevant. It's
19 part of this process.

20 If you want to file a motion to quash if
21 we send him a subpoena, that's one thing. I'm
22 asking for the address.

23 MS. SMITH: Do we have a protective order in
24 place?

25 MR. LITTLE: We do.

Page 159

1 Q Do you have a business e-mail account?

2 A I do.

3 Q Okay. And what is that e-mail address?

4 MS. SMITH: You can answer.

7 BY MR. LITTLE:

8 Q And what is your personal e-mail address'
9 address?

10 MR. MOVIT: I'm going to --

11 MS. SMITH: I'm going to object that that is
12 private and confidential, and there is no relevance
13 to that information.

14 BY MR. LITTLE:

15 Q You may answer.

16 MS. SMITH: No, I'm going to instruct the
17 witness not to answer.

18 MR. LITTLE: The relevance is we're about to
19 start a large process of electronic discovery at
20 which time knowing whether or not his e-mail address
21 is his e-mail address is going to be highly relevant
22 to whether or not he's on the communications or is
23 aware of something.

24 And so I'd ask, then, that we reserve the
25 right to redepose him after our electronic discovery

Page 161

1 MS. SMITH: Do I, as a third-party counsel,
2 have the right to assert a confidentiality
3 privilege?

4 MR. LITTLE: Sony I believe does. Because
5 Sony's -- we have a joint sort of agreement between
6 Sony in California -- I mean, Sony in the New York
7 case and the Tennessee case. And certainly we would
8 agree at this time to keep his e-mail address and
9 personal identifying information like that --

10 MR. MOVIT: I would note that --

11 MR. LITTLE: -- confidential.

12 MR. MOVIT: -- the case to which Sony is a
13 party in New York, there is not yet an executed
14 protective order.

15 MR. LITTLE: The parties have agreed to the
16 format.

17 MR. MOVIT: No, there is still disagreements as
18 to certain terms. So I just want the record to be
19 clear.

20 MS. SMITH: Counsel, here's what I'd like to
21 do. I am not personally familiar enough with the
22 protective orders in this case to feel comfortable
23 designating anything Confidential on this record.

24 However, I hear what you're saying, and
25 I'm willing to meet and confer about getting you the

Page 162

1 e-mail address, once I am comfortable with that
2 after this deposition.

3 So why don't we do this, let's leave a
4 blank in the transcript, and the parties can meet
5 and confer.

6 MR. LITTLE: Perfect.

7 MS. SMITH: All right. Thank you.

8 (Information Requested: _____.)

9 BY MR. LITTLE:

10 Q Those two e-mail accounts, the one we have
11 described as a personal e-mail account, and the
12 e-mail account that you use for work that you
13 described the address for, are those your only two
14 active e-mail accounts?

15 A No.

16 Q Okay. What other e-mail accounts do you
17 have, just general descriptions?

18 A I have an e-mail that I send myself MP3s
19 of work I'm working on to listen in my car. And one
20 other for spam, signing up for a contest.

21 Q Would the two e-mail accounts be described
22 as personal and work be your primary communications
23 via e-mail?

24 A Yes.

25 Q With respect to your cell phones we have

Page 163

1 described as your iPhone, and that it holds the text
2 messages in Exhibit 1, is that your primary phone?

3 A Yes.

4 Q Do you have any other cell phones?

5 A No.

6 MR. LITTLE: It's 6:00. We had previously
7 discussed asking you to hold open this deposition
8 for a future date and continuing it then, given the
9 length. And we'd ask to do that at this time.

10 I know that counsel wants to put something
11 on the record about that.

12 MR. MOVIT: Okay. So it was fairly late to
13 this deposition that we were told that counsel for
14 Ms. Sebert purportedly could not stay past 6:00 p.m.

15 We still have not been provided with a
16 reason why that is. We were not told this prior to
17 scheduling the deposition.

18 It appears that there would be a cutoff at
19 6:00 p.m. It appears that counsel has been
20 asking -- it doesn't appear. Counsel has been
21 asking irrelevant and harassing questions, including
22 communications between Mr. Gibbs and his fiance. It
23 appears that counsel is trying to run the clock out
24 and come back later.

25 So to the extent that counsel for

Page 164

1 Ms. Sebert wishes to end the deposition today, they
2 do so at their own peril.

3 MR. LITTLE: Then, Jeff, I have to say that's
4 one of the more unprofessional things I have seen.
5 You have taken two hours of breaks to meet and
6 confer and to coach this witness, and you have
7 taken -- scheduled a conference call in the middle
8 of this deposition without telling any parties.

9 We agreed to meet at 12:30 to deal with
10 counsel's schedule. I do not believe it should be
11 expected by any party to keep counsel past 6:00,
12 particularly on a day they are supposed to leave
13 California.

14 In particular you have two other parties
15 here who I don't believe have even been asked about
16 their availability past 6:00 p.m., and I'm asking
17 for professional courtesy. We will be back out here
18 in LA where Clint lives -- Mr. Gibbs lives, to
19 continue this deposition at a later date.

20 And I'm asking for the record whether or
21 not you're willing to do that.

22 MR. MOVIT: We will -- we're not agreeing at
23 this time.

24 And what is the reason why you can't stay
25 past 6:00 p.m.?

Page 165

1 MR. LITTLE: Because I have other plans.

2 MR. MOVIT: Will you disclose what they are?

3 MR. LITTLE: No.

4 MR. MOVIT: Okay. Well, then you will
5 terminate this deposition at your peril.

6 MR. LITTLE: I'm going to take a break. We may
7 or may not come back. We will -- we're going to
8 take a break.

9 THE VIDEOGRAPHER: Going off the record at
10 6:03 p.m.

11 (A discussion was held off the record.)

12 THE VIDEOGRAPHER: We're back on the record at
13 6:13 p.m. Counsel, you may proceed.

14 BY MR. LITTLE:

15 Q Good afternoon, Mr. Gibbs -- or I guess it
16 is early evening now.

17 Do you recall earlier today taking breaks
18 during your testimony?

19 A Yes.

20 Q Okay. Do you know approximately how many
21 breaks we took?

22 MR. MOVIT: Object. The record speaks for
23 itself.

24 THE WITNESS: Yeah, I would have to ask the
25 record how many times we took a break. I don't

Page 166

1 recall.

2 BY MR. LITTLE:

3 Q Okay. The first time we took a break, do
4 you recall how long that break was, approximately?

5 MS. SMITH: I just object to this whole line of
6 questioning on the grounds that it is argumentative
7 and harassing, but you can answer.

8 THE WITNESS: To be honest, I don't recall. I
9 remember getting here today, and I couldn't even,
10 without hearing from you, tell you what time it is
11 right now.

12 BY MR. LITTLE:

13 Q Okay. When you took a break who was
14 present with you?

15 A I believe --

16 MR. MOVIT: Object to the form --

17 THE WITNESS: -- that may be privileged --
18 (Reporter clarification.)

19 MS. SMITH: You can answer the question,
20 although -- are you asking at any point during the
21 break?

22 MR. LITTLE: Yeah I'll be clear.

23 MR. MOVIT: Are you referring to the first
24 break?

25 ///

Page 168

1 were present -- I am not going to ask about the
2 subject of your conversations -- but did you, or did
3 you not talk about the subject of this deposition?

4 MR. MOVIT: Wait. That's --

5 MS. SMITH: Yeah --

6 MR. LITTLE: It's a yes-or-no question.

7 THE WITNESS: I believe it to be privileged.

8 BY MR. LITTLE:

9 Q The question I'm asking is whether, yes or
10 no, you talked about the subject of this deposition
11 in that meeting?

12 MS. SMITH: I am going to instruct the witness
13 not to answer on the grounds that it calls for
14 attorney-client privileged communications.

15 MR. LITTLE: We have a right to examine whether
16 or not this witness was coached during the
17 deposition in the middle of questioning. And if
18 you're asking him not to answer that question we
19 will seek leave of the court to compel an answer and
20 stop the deposition at this time on that ground.

21 MS. SMITH: Okay.

22 MR. LITTLE: Okay. Then that's all for today,
23 Mr. Gibbs. Thank you.

24 I'm sure we'll see you again.

25 THE VIDEOGRAPHER: Going off the record at

Page 167

1 BY MR. LITTLE:

2 Q We took a break at approximately 12:00--
3 excuse me, approximately 1:19 p.m. that lasted until
4 1:47 p.m. was the first break we took during your
5 testimony.

6 Do you recall that break?

7 A I recall we took a break.

8 Q Did you at any point go into a conference
9 room during that break?

10 A I went to the bathroom, and I went into
11 room where my Diet Coke is, I don't know if it's a
12 conference room.

13 Q Who else was with you in that room?

14 A I am going to ask --

15 MS. SMITH: You can answer.

16 THE WITNESS: Katherine and Gabby, Jeff.

17 BY MR. LITTLE:

18 Q Was anyone else participating in that room
19 via telephone or video conference?

20 MS. SMITH: What do you mean "participating"?

21 BY MR. LITTLE:

22 Q Anyone else present via telephone or video
23 conference?

24 A No.

25 Q Okay. At that time, when those people

Page 169

1 6:16 p.m.

2 This will end proceedings for today,
3 June 15, 2016.

4 (The deposition was adjourned
5 at 6:16 p.m.)

6 * * *

Page 170

* * *

I, DECLARE UNDER PENALTY OF PERJURY THAT THE
 FOREGOING IS AN ACCURATE TRANSCRIPTION OF MY
 TESTIMONY UNDER THE LAWS OF THE STATE OF CALIFORNIA,
 EXECUTED ON THE ____ DAY OF _____,

 CLINTON GIBBS

Page 171

REPORTER'S CERTIFICATE
 OF
 CERTIFIED SHORTHAND REPORTER

I, THE UNDERSIGNED CERTIFIED SHORTHAND REPORTER, IN
 AND FOR THE STATE OF CALIFORNIA, DO HEREBY CERTIFY:
 THAT THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE ME
 AT THE TIME AND PLACE THEREIN SET FORTH, AT WHICH
 TIME THE WITNESS WAS PUT UNDER OATH BY ME; THAT THE
 TESTIMONY OF THE WITNESS AND ALL OBJECTIONS AT THE
 TIME OF THE PROCEEDINGS WERE RECORDED
 STENOGRAPHICALLY BY ME AND WERE THEREAFTER
 TRANSCRIBED UNDER MY DIRECTION; THAT THE FOREGOING
 IS A TRUE RECORD OF THE TESTIMONY AND OF ALL
 OBJECTIONS MADE AT THE TIME OF THE PROCEEDINGS.

IN WITNESS WHEREOF, I HAVE SUBSCRIBED MY NAME ON:

DATE: June 27, 2016

 LESLIE L. WHITE, CSR NO. 4148

Page 172

NAME OF CASE:

DATE OF DEPOSITION:

NAME OF WITNESS:

Reason Codes:

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

 CLINTON GIBBS

A	103:21 165:15	58:6 132:1	163:18,19,23	140:21 141:16
ability (2)	aggressive (2)	anger (1)	appetizers (1)	142:5 145:7 152:20
160:5,16	147:8 149:2	144:16	68:19	164:15
able (4)	aggressively (2)	angry (2)	appreciate (4)	asking (32)
68:15 99:11 120:22	35:18 147:5	144:21,23	88:9 101:16 110:16	47:6 53:18 55:23
121:3	ago (3)	Animal (11)	128:1	72:15,16 80:5 86:20
abuse (1)	143:18 153:4 156:20	17:21 18:21 19:5	appreciated (1)	88:6 90:3 92:15,15
83:5	agree (2)	20:23,25 21:15	47:25	92:22 93:21 95:15
abusive (1)	84:19 161:8	23:21 24:13 30:25	approachable (1)	97:2 101:3 110:22
135:7	agreed (2)	37:22 71:21	80:20	110:24 119:25
accident (2)	161:15 164:9	animals (1)	appropriate (4)	121:19 142:1
8:9 9:10	agreeing (1)	134:2	88:8 101:25 102:3	151:21 153:21
account (13)	164:22	answer (61)	110:12	160:22 163:7,20,21
135:10,16,19 136:5	agreement (5)	5:13 8:19,20,23 70:19	approximate (1)	164:16,20 166:20
158:5,7,13,15,23	94:5,8 99:12 101:12	75:13 86:15 88:1,24	116:10	168:9,18
159:1 160:8 162:11	161:5	89:25 90:1,2,20	approximately (19)	asks (1)
162:12	ahead (1)	92:21,24 94:3,23	6:6 8:3 12:10 21:1,3	104:21
accounts (4)	137:21	95:14 96:1,2 97:11	104:3 109:12	assert (2)
162:10,14,16,21	ailment (1)	98:2 100:7 102:7	116:11 126:13	94:10 161:2
ACCURATE (1)	9:9	103:4,5 104:9,10	135:15,17 141:2,6	assistant (18)
170:5	airport (3)	105:4 110:11,13,20	142:4 143:15	9:19 10:1,3,18,21,25
act (4)	48:25 52:22,24	111:4 117:2 122:1	165:20 166:4 167:2	11:2 13:16 15:14
67:7,10 90:15 92:7	album (38)	122:23 123:25	167:3	17:13 37:6 64:10
acted (3)	17:20 21:17 26:2 27:5	129:1 130:1 132:25	April (6)	81:1 87:6,22 143:6
38:17 89:11 92:4	28:15 29:24 33:1	134:22 138:9 139:4	42:7,11 117:14,18,22	143:6,7
acting (2)	60:23 63:8 64:23	139:24 142:16	126:21	associated (4)
87:21 91:21	66:1,2 67:24 69:10	145:1 147:3 151:14	area (5)	120:19,24 121:4
action (1)	69:18 70:6,14,25	153:18 154:8 155:5	45:19,22,22,25 49:10	142:12
6:22	71:18 72:4,22 73:1	156:9 159:4,15,17	areas (1)	association (1)
active (1)	73:6,7,9,12,19	166:7,19 167:15	16:16	6:17
162:14	74:15 75:23 76:2,18	168:13,18,19	argumentative (4)	assume (1)
add (2)	76:22 77:3,4,4	answered (9)	90:17 92:18 98:12	99:4
77:14 92:25	147:14 148:18	90:17 91:17 92:13,18	166:6	ate (2)
addition (2)	149:5	97:21,22,24 98:11	arms (2)	62:24 63:21
21:23 151:2	albums (2)	140:5	67:2,5	atmosphere (3)
address (11)	78:8 93:2	answering (2)	arriving (1)	18:20,22 21:13
82:18 159:3,8,9,20,21	alcohol (1)	93:15 97:18	129:11	attack (1)
160:1,22 161:8	69:15	answers (5)	Artie (2)	144:6
162:1,13	Alex (9)	88:6,21 97:20,24	57:3,8	attend (1)
adjourned (1)	3:16 7:1 81:3 84:12	135:21	artist (15)	11:9
169:4	84:19 85:8 103:10	anticipated (1)	12:20 35:25 78:4	attendance (2)
adjust (2)	137:19 160:6	148:19	89:11 90:14,23 91:2	17:23 67:22
9:11 34:22	Alias (1)	Anybody (1)	91:5,9,10,15 145:22	attended (1)
advances (1)	41:10	105:18	145:25 147:19,24	18:18
91:4	aliens (5)	anyone's (1)	artists (14)	attention (2)
adverse (1)	79:24 80:6,8,12,13	77:15	11:9 14:9,12,18,21	138:23 147:22
100:24	allow (1)	Anytime (1)	21:20 27:4 87:13,18	attorney (3)
advice (1)	105:3	51:11	88:7,11 89:16 90:4	8:19 94:1 104:21
81:15	America (1)	appeal (2)	91:19	attorney-client (17)
advisor (5)	22:18	73:22 76:8	aside (1)	93:25 95:22 99:5,11
10:1,3,19,21,25	Ammo (7)	appear (4)	58:12	99:14,18,22 100:11
affiliated (1)	18:9 22:2 124:17,21	28:11 29:10 71:13	asked (27)	101:10,24 110:23
91:19	125:12 140:16	163:20	32:14 35:4,12 46:19	110:25 131:6
after-hours (2)	150:4	appearances (1)	49:8,11 53:5 65:19	151:22 152:4
33:4 149:15	amps (1)	6:18	65:23 90:16 91:8,17	153:25 168:14
afternoon (7)	76:4	appeared (1)	92:13,18 98:11	attorneys (9)
6:4,20 7:18,19 85:3	Angeles (7)	152:20	108:11 110:12,19	3:4,13 4:4 94:15
	1:17 2:10 4:7 6:1,12	appears (3)	112:16 126:1 140:3	102:9,10,11 111:16

114:8 Ava (1) 64:4 availability (1) 164:16 Avenue (1) 4:6 average (1) 13:9 avoid (1) 135:8 aware (9) 30:16 32:12 78:10,14 79:19 141:9 150:2,3 159:23 awkward (1) 34:20	73:22 76:8 based (5) 96:17 98:4 108:16 117:24 120:15 basement (1) 76:13 basements (1) 39:14 basis (3) 99:11,17 130:7 Bates (1) 40:20 bathroom (8) 32:1,4 33:23,25 34:5 34:11,12 167:10 beach (2) 39:13 66:25 beard (17) 33:9,10 69:17,19,19 147:11,12,13,14,16 147:21,25 148:2,3 148:17,23 152:12 beards (1) 147:11 beat (1) 58:20 began (4) 63:4 126:19,24 134:20 beginning (5) 6:7 29:19 79:15 132:5 132:16 behalf (5) 6:15 7:1,6,7 100:12 behaved (3) 89:17 90:5,25 behavior (7) 30:24 31:3,18,21 69:12 86:8 89:21 belief (1) 123:10 believe (27) 9:21 15:18 17:16,20 22:18 29:8,12 32:17 52:7 64:2 73:1 90:5 103:3 111:12 117:25 120:21 121:3 125:13 144:13 153:18 155:10 156:19 161:4 164:10,15 166:15 168:7 believed (3) 90:24 108:11,14 bend (1) 32:6 benefits (1) 36:16	Benny (11) 18:9 22:3 29:1 38:22 38:24 39:1 78:23 125:8,12 140:17 150:4 berating (1) 80:25 best (27) 9:12 18:2 20:3 38:1 71:20 76:4,4,5 90:10 91:16 92:23 101:16 116:10 120:7 122:2 123:10 125:6,8 126:23,25 131:11,19 132:1 141:15 143:14 157:15,20 better (6) 51:21 54:16 88:18 102:2 134:9 148:22 Bew (1) 74:1 big (6) 23:9 51:18 59:7 63:20 69:19 73:20 bit (7) 35:22 48:12 61:5 66:15,17 92:23 155:23 Blaah (1) 47:17 black (3) 55:9 77:1 148:2 Blackbird (4) 30:11 68:4,6 70:6 Blanco (9) 18:9 22:3 29:2 38:22 78:24 125:8,12 140:17 150:4 blank (1) 162:4 blue (1) 56:9 blush (1) 147:17 board (1) 74:16 BONE (1) 3:12 boobs (1) 38:24 book (2) 60:3,7 booked (2) 21:10 28:16 booth (9) 32:4 33:18,19,20 34:9 34:11,13,18 77:18	boss (1) 35:25 bottle (1) 31:23 bottom (1) 157:5 Boulevard (2) 2:10 6:12 bouquet (5) 42:18,24 44:21 46:22 47:9 bout (1) 58:2 bragged (1) 60:2 bragging (1) 59:4 brain (1) 73:4 brand (1) 53:18 break (19) 9:5,13 37:12 79:8 103:12 154:13 165:6,8,25 166:3,4 166:13,21,24 167:2 167:4,6,7,9 breaks (6) 16:17 63:22 94:10 164:5 165:17,21 brief (1) 9:11 briefly (2) 104:6 126:6 bringing (1) 61:18 brother (3) 60:19 139:9 148:5 brought (6) 36:21 78:23,24 110:2 111:20 147:22 buddy (1) 54:5 Bui (2) 42:13 46:10 bullying (2) 82:16 146:8 bundle (1) 45:1 bus (2) 59:21,25 business (1) 159:1 butt (2) 54:11,14 buttocks (5) 52:12,18,24 53:2,9	C C (2) 3:1 4:1 c-l-i-n-t (1) 159:5 C-l-i-n-t-o-n (1) 7:25 California (12) 1:17 2:10 4:7 6:1,13 30:13 132:8,21 161:6 164:13 170:6 171:9 call (5) 84:12 103:10 113:20 113:23 164:7 called (8) 34:2 65:20 76:16 78:1 80:3 100:8 113:21 113:22 calling (1) 95:21 calls (9) 93:23,24 94:22 95:11 99:2,5 115:15 158:10 168:13 Calvin (1) 59:6 camera (4) 31:12 64:7 81:8 148:7 camp (1) 18:25 candy (1) 16:25 Cannibal (11) 20:14,17 21:2,7,14 22:6 23:2 25:4 30:25 37:22 71:21 caption (1) 102:22 car (7) 8:9 9:9 22:13 23:22 66:16 149:17 162:19 carbs (1) 62:23 care (1) 32:17 career (1) 92:12 carefree (1) 30:22 carried (2) 31:4,15 carved (1) 153:25 case (14) 8:10 85:10 96:11
---	--	--	--	--

97:23 102:18 105:1 111:12 112:5 130:25 161:7,12 161:22 172:1 cases (10) 96:18,19,20,23 97:4,5 97:7,10 98:15 130:25 Casters (1) 60:3 Cathy (1) 64:5 cause (2) 47:5 145:6 caution (1) 96:7 celebrities (1) 59:6 cell (8) 41:2 59:5 115:20 122:12,14,17 162:25 163:4 certain (7) 28:24 57:11 60:11 88:25 102:24 118:3 161:18 certainly (3) 81:10 88:16 161:7 CERTIFICATE (1) 171:1 CERTIFIED (2) 171:3,8 CERTIFY (1) 171:9 chair (1) 74:23 changed (1) 66:8 chaos (1) 84:18 character (1) 39:1 characterization (1) 65:4 characterize (6) 19:8,17,20 20:8 23:5 23:11 charge (1) 27:2 chatting (1) 47:23 check-in (1) 49:1 checked (2) 40:8 134:18 chief (1) 9:18 children (1)	139:11 chord (1) 74:24 chorus (2) 61:5 79:1 chosen (2) 34:10 68:4 Christine (6) 3:8 6:25 100:17 105:22 106:5,10 chunk (1) 21:9 chyea (1) 56:2 circumstances (2) 86:24 87:1 Cirkut (10) 28:25 32:22 49:3 58:20 64:13 73:15 125:9,12 140:17 150:4 city (1) 68:16 clarification (10) 91:12 92:15 99:8 100:3 102:20 109:9 128:2,5 141:23 166:18 clarify (12) 10:6 16:13 80:24 125:24 127:21 130:4 133:13,25 138:17 141:20,24 172:5 clean (1) 32:16 clear (22) 47:24 90:13,22 94:4 100:4 101:4 105:1 107:7 110:17 111:2 113:13 118:19 120:12 128:4,18 129:21 133:7 134:18 140:11 151:1 161:19 166:22 clearly (1) 160:18 client (9) 18:17 22:24 47:4 60:12 99:12,15 100:24 110:24 148:13 clients (2) 11:9 27:4 clint (5) 33:8 85:3 135:14 159:5 164:18	CLINTEAZHOOD... 135:14 CLINTEAZTHOO... 135:13 Clinton (9) 1:16 2:8 5:3 6:8 7:11 7:22 79:15 170:12 172:24 clock (1) 163:23 close (4) 40:7 66:22 70:16 83:25 closely (1) 145:18 closest (1) 141:7 clothes (1) 68:21 club (3) 32:23 69:2 149:14 clue (1) 44:11 co-counsel (2) 6:23,25 co-write (1) 72:4 co-writing (2) 72:7,17 coach (1) 164:6 coached (1) 168:16 coaching (2) 110:14,19 Coast (3) 66:20,23 67:18 cocking (1) 134:7 cocks (1) 47:15 code (4) 45:19,22,23,25 Codes (1) 172:4 coffee (1) 16:5 Coke (1) 167:11 collection (1) 41:1 colloquy (1) 98:18 color (2) 41:15,15 colors (1) 41:12 come (23)	16:16 33:8,15 38:3 58:23 59:20 61:6,10 76:11,17 80:14 109:3 113:3 117:8 119:17,17 121:8 149:18 152:21 156:12,24 163:24 165:7 comes (2) 75:3 133:15 comfortable (21) 19:2,18,21 20:6,9 23:9,12,14 34:19 44:25 47:6 71:5,7 71:13,15,23 72:1 81:12 148:10 161:22 162:1 coming (8) 21:16 22:4 23:15 70:8 107:14,17 108:18 149:14 commence (1) 28:14 commenced (2) 29:24 42:10 comment (3) 82:2 149:6 150:15 commented (1) 147:16 commenting (1) 59:7 comments (14) 24:16 25:18,21 37:23 38:6,13 114:18 128:21 129:4 139:15,16 150:18 150:22 151:3 common (2) 16:16 87:12 communicate (5) 100:25 115:13 158:17 158:20,24 communicated (5) 58:14 85:19 123:11 124:20 125:4 communicating (3) 110:9 111:8,9 communications (16) 100:25 101:11 105:2 108:3,17 126:7 131:10 152:5,15 154:1 157:16 159:22 160:8 162:22 163:22 168:14 company (2) 10:14 54:21 compel (1)	168:19 comping (1) 58:21 complain (4) 19:22 82:14 84:2,5 completed (1) 65:19 Compound (1) 150:7 computer (1) 36:12 computers (1) 77:20 concern (1) 100:7 concerts (1) 59:24 conclusion (2) 94:22 95:12 confer (3) 161:25 162:5 164:6 conference (8) 81:7 105:21 106:11 164:7 167:8,12,19 167:23 conferences (1) 94:16 conferring (2) 94:11,15 confidential (7) 88:15 155:10 158:11 159:12 160:4 161:11,23 confidentiality (1) 161:2 conform (1) 172:5 confused (2) 130:13,17 confusing (3) 88:19 92:23 116:24 confusion (1) 155:23 congrats (2) 58:1,5 congratulations (1) 108:22 connected (1) 80:6 connection (4) 8:16 13:25 95:6,9 consider (1) 85:20 consistent (4) 31:1,19 38:17 69:13 contact (12) 115:6 118:25 119:8 119:15 120:17,19
---	--	--	--	---

120:23 121:5 150:5 150:7,10 157:7 contest (1) 162:20 continue (4) 30:2,5,8 164:19 continued (2) 30:6,13 continuing (2) 138:4 163:8 control (1) 123:13 controversy (2) 78:10,13 conversation (26) 16:6 22:25 42:21 59:20 111:15 112:22 113:10,14 113:18 121:18 127:5,15 140:12,15 140:20 141:10 142:5 143:20 144:12,17,19,20 146:5 151:22 152:24 155:13 conversations (32) 24:10 25:2,9,12,16,23 36:4,9 59:9 61:12 61:17 72:2 96:2,9 102:8 109:2,24 115:17 127:2 128:25 129:18 130:5 131:7 140:22 141:11 142:10,25 143:16 151:9 152:22 160:13 168:2 Conway (18) 11:1,4,6,7 12:12,17 12:18 15:11,12,17 17:9 18:21 20:21 21:6,13 22:17 23:16 71:20 cool (3) 49:16 56:19 76:14 cord (1) 75:3 Corina (1) 37:2 Corino (1) 37:2 correct (47) 41:16 42:7 43:4,11,13 43:17,18,19 44:4,12 44:21 45:10,11 46:22,23 47:12,13 47:15,16,18,19 48:4 48:18,19 50:1 52:13	57:22 63:5 94:20 95:3,4,8 104:16 105:10 108:19 109:19 117:12,22 117:23 118:7,22 120:13,16 123:18 134:21 143:11 172:6 corresponded (1) 157:6 correspondence (4) 48:23 153:12,14 156:10 costumes (1) 68:24 couch (3) 38:23 59:10 148:9 counsel (33) 6:18,21 37:19 40:20 79:17 96:2 98:16 103:19,24 111:1,9 121:17 123:20,23 124:12 139:2 153:14 154:7,11,24 155:4,9 156:5 161:1 161:20 163:10,13 163:19,20,23,25 164:11 165:13 counsel's (1) 164:10 country (1) 76:5 counts (1) 47:18 course (2) 122:18 124:7 court (8) 1:1 6:16 7:8 8:22 102:22,23 139:13 168:19 courtesy (1) 164:17 coworkers (1) 35:25 crack (1) 54:4 crazy (4) 129:15 140:4 144:4,5 creative (7) 64:23 65:7 73:8,11,18 74:15 75:24 creatively (1) 77:5 criticize (1) 62:8 Cross (1) 84:13 CRUTCHER (1)	4:3 CSR (3) 1:23 2:11 171:25 current (6) 9:16 11:21 13:25 25:25 117:9 118:10 Currently (1) 9:18 cut (1) 93:10 cutoff (1) 163:18 cycle (1) 61:21 <hr/> D <hr/> D (1) 5:1 d-r-l-u-k-e.com (1) 159:6 dandruff (1) 148:2 Daniels (1) 31:23 dark (1) 50:15 date (17) 23:20 48:21 109:12 117:11,14,17 135:3 141:6 153:21,22,23 156:17,19 163:8 164:19 171:22 172:2 dating (2) 126:20 153:6 daughter (1) 64:4 daughter's (1) 64:5 day (25) 13:9,13,14,24 14:6 27:5,16,23 67:22 99:24 113:5,6,8,8,9 113:9 114:12,22,25 115:16 133:25 144:3 153:2 164:12 170:7 days (11) 13:8,22,23 14:5 18:3 27:16,22 59:1 68:11 70:8,10 de (1) 51:2 deadline (1) 71:1 deal (1) 164:9 death (6)	129:8,12 137:14 143:24 144:3,24 debut (1) 17:20 decided (1) 32:3 DECLARE (1) 170:4 deemed (1) 16:24 Def (1) 48:3 defendant (3) 1:9 3:13 8:13 defense (15) 94:2,5,8,16 95:23,24 99:3,12,19 100:8,22 101:12,24 111:5,11 define (1) 96:19 definitely (2) 36:22 56:7 degree (4) 36:1 60:11 80:8 85:19 delete (5) 123:21,24 125:19,24 126:2 deleted (2) 122:6 125:14 deleting (2) 122:7 123:6 demanding (2) 87:9,20 demeanor (4) 16:21,23 60:24 66:8 Depends (1) 54:23 depicted (1) 120:13 deposed (9) 8:1,3,8,11 95:7 100:13 107:19 109:18 112:4 deposition (39) 1:16 2:8 6:8,10 8:16 79:15 103:25 105:15 106:15 107:14 108:14,18 108:25 110:3 111:21 112:13,19 113:3,15 114:1,5,10 114:19 115:4 126:8 162:2 163:7,13,17 164:1,8,19 165:5 168:3,10,17,20 169:4 172:2 depositions (1) 104:24	descended (1) 80:12 describe (17) 16:10 21:12 30:19,21 37:3 39:10 60:23 63:16 74:3 83:24 85:13 87:8,9 96:23 102:19 136:19 139:19 described (11) 69:14 86:9,17,25 87:21 120:3 152:11 162:11,13,21 163:1 describing (2) 73:19 93:6 descriptions (1) 162:17 descriptive (1) 74:13 design (1) 50:14 designating (1) 161:23 detail (1) 96:24 details (4) 25:1 69:25 121:8 133:14 determine (2) 120:23 160:1 Diaz (1) 64:6 dick (4) 42:18,24 59:5 91:4 Dickerson (4) 3:17 7:3,3 100:17 Die (2) 78:1,21 diet (3) 62:17 81:20 167:11 diets (2) 62:14 63:1 difference (2) 101:13 134:6 different (7) 9:22 10:14 55:6 62:14 63:1 65:15 134:2 difficult (2) 129:17,23 Digiplant (3) 34:2 38:22 80:3 dining (1) 59:10 dinner (7) 16:17 42:14 65:13,14 65:16 107:19 109:6 dinners (1) 63:21
---	--	--	--	---

direct (9) 84:9 86:25 88:24 89:20 94:6 110:13 110:19 135:22 138:6 directed (2) 93:2 110:10 directing (1) 90:2 direction (3) 59:25 111:9 171:16 directly (10) 13:2,5,17,20 14:1,4 27:8,10,18,20 Dirty (1) 76:19 disagreements (5) 64:18,20,24 65:7 161:17 disc (4) 6:7 79:10,11,15 disclose (1) 165:2 discomfort (1) 146:18 discover (2) 137:5 157:4 discovery (4) 159:19,25 160:3,17 discuss (8) 36:22 79:24 82:6 108:10,13 139:21 141:18 156:15 discussed (7) 112:19 114:10 129:14 154:9 155:7 160:14 163:7 discussing (1) 92:8 discussion (9) 74:20 84:15 99:24 124:10 140:7 149:23 154:20 156:2 165:11 discussions (1) 129:9 disliked (1) 147:9 display (1) 119:7 displaying (1) 120:11 dispose (1) 32:14 disrupt (1) 46:13 distracting (1) 81:11	DISTRICT (2) 1:1,2 DIVISION (1) 1:3 divulge (6) 95:22 96:8 102:8 111:13 114:7 131:6 divulged (1) 99:6 divulging (2) 103:23 110:6 doctrine (2) 94:1 95:23 document (11) 40:19,22,25 102:21 102:25 103:5 117:24 118:13,14 119:6 121:13 documents (6) 102:18,24 106:17,20 106:22 107:4 Dodge (1) 51:19 doing (14) 15:12,16 17:10,14 36:17 55:13,16 62:13 88:16 92:23 94:11 101:16 128:19 137:24 domestic (1) 83:22 dong (2) 46:22 47:9 door (6) 39:24 40:12 66:13 76:16 149:13,15 doors (4) 33:3 39:21,22 40:6 dope (3) 49:20 56:14,20 downstairs (9) 32:2,13 34:1 35:8 58:23 65:13,24 149:13 156:12 Dr (131) 1:4 12:8,10,15,18 13:2,6,10,17,19 14:1,3 15:25 17:23 18:5 19:5,19,23 20:3,7 22:2 23:2,12 24:2 26:11,14,17 27:8,11 28:24 30:6 30:12 32:22 38:6 49:2,24 58:19 60:21 62:5,8 63:12,18,24 64:11 65:24,24 66:23 67:1,4,7,10 67:12,14,19,25	70:12 71:5,6,14,17 71:24 72:16 73:15 74:14 77:19 79:20 82:2,17,17,19,22,24 83:1,4,8,10,13,15 83:19 84:3,6 93:3 94:5,8 96:5,21 107:15,20 108:2,20 109:18 110:2 111:6 111:15,21 113:4,11 113:14,22,23 114:4 114:18 115:14,22 121:24 122:8 123:7 123:12 124:15 125:3 126:7,11 129:13 130:10 131:1,22 133:18 134:9,12 137:22 138:21 139:15 140:12,21 141:5,10 141:16 143:3,8,24 144:2 drank (1) 36:16 dress (1) 61:9 drink (3) 31:22 36:19 37:10 drinking (3) 31:5,10 69:17 drinks (1) 38:10 driven (1) 51:22 driver (1) 22:24 drives (1) 32:25 driving (1) 22:24 drum (9) 49:4,6,15 50:4,13,17 54:3,21 57:8 drummer (1) 55:8 drums (10) 49:9 52:13 53:12,19 54:13 55:10 56:9 57:10 58:4,5 drunk (4) 70:3 149:22 150:17 152:20 drunkenly (1) 33:7 dubbed (1) 134:1 duly (1) 7:13	Dunn (2) 4:3 7:5 duties (4) 11:6,7,17,21 duty (1) 11:11 dw (1) 57:18 dws (3) 53:11,18,22 <hr/> E <hr/> E (6) 3:1,1 4:1,1 5:1,6 e-mail (22) 143:25 158:5,7,15,23 159:1,3,8,20,21 160:1,15 161:8 162:1,10,11,12,14 162:16,18,21,23 e-mailed (1) 80:10 e-mails (2) 160:2,11 earlier (10) 9:10 20:2 21:3 37:21 38:15 50:13 61:6 71:16,18 165:17 early (9) 11:5 29:8 72:25 141:7 141:21,22,25 142:3 165:16 easier (1) 152:10 East (1) 3:5 Eastwood (1) 135:14 eat (4) 81:16,24,25 82:3 eating (1) 65:13 Echo (1) 31:9 editing (1) 36:12 effect (8) 33:8 66:9 70:1 80:4,5 80:13 81:23 156:14 effort (1) 101:23 either (7) 32:10 65:14 88:13 118:24 119:8 132:1 153:9 electronic (3) 73:25 159:19,25 Elliott (1)	12:21 embarrassed (4) 35:23 55:15,17 60:11 Emily (3) 18:9 20:3 22:3 emotionally (2) 129:17,23 employed (5) 12:22 14:8 26:9,10 95:2 employer (1) 111:7 employment (3) 13:3,6,16 employs (1) 94:7 ended (1) 33:13 engage (1) 22:25 engaged (2) 126:16 127:22 engineer (10) 9:18 10:1,3 11:2 13:16 15:15 17:13 18:9 22:3 27:1 engineer/technical (...) 10:19,21,25 engineers (3) 91:20 92:4 147:18 enjoy (2) 44:25 147:21 enjoyable (2) 34:24 69:7 enjoyed (4) 19:15 35:21 47:15 68:15 Entertainment (1) 7:7 entire (2) 21:11 135:23 entirely (2) 135:22 138:5 entities (1) 111:6 entitled (3) 20:14 26:3 104:23 environment (7) 19:2 22:10 63:17,23 68:12 70:22 147:18 EP (1) 20:13 equally (1) 110:18 equipment (1) 28:18 errors (1) 172:6
--	---	---	---	--

especially (1) 37:9	62:18	23:9 63:20,20,24	find (3) 120:15 121:3 145:5	floors (1) 49:21
ESQ (6) 3:7,8,9,16,17 4:8	exhibit (15) 5:8 40:14,16 58:12	83:19 139:9 151:3	finding (2) 62:17 136:6	flushed (1) 35:22
essentially (1) 118:20	106:23 107:5 117:6	158:18,19,21	fine (4) 14:16,24 97:2 103:13	focus (1) 66:1
establish (1) 160:7	117:11 120:13	fan (2) 73:22 76:8	finish (3) 65:25 66:6 72:13	focused (2) 70:24 138:10
established (2) 122:21 130:15	153:11 154:10	fans (5) 129:9 138:18 144:4,5	finished (2) 75:12 84:10	foiled (1) 46:3
evening (2) 68:19 165:16	155:8 157:10,12	145:5	finishing (2) 65:17 70:25	follow (1) 136:21
Ew (1) 54:4	163:2	far (4) 34:3 94:20 98:23	first (47) 7:13 11:18 12:10,16	following (5) 29:19 48:21 67:24
ewww (2) 39:2 60:15	expect (1) 111:3	115:25	12:19 15:5,7 20:11	70:6 72:21
exact (5) 15:7 76:1 133:3 143:5	expected (2) 112:16 164:11	favorite (1) 57:7	21:17 29:25 43:3	follows (4) 7:14 127:13 132:13
156:19	experience (4) 69:7 80:16 87:14,17	favz (1) 57:3	47:2 49:14 54:13	155:2
exactly (6) 29:20 42:12 48:24	experienced (1) 45:7	February (13) 29:8 39:6 135:2 140:1	57:2,6 61:19 79:3,7	food (9) 11:8 16:6 27:3 46:7
73:17 77:5 81:22	experiences (1) 93:4	141:11,16,17,21,25	101:15 108:21	46:11,12,13,14
exacts (1) 133:4	experiencing (1) 88:23	142:4,10,14 143:17	109:6,7 111:20,25	156:12
Examination (5) 5:2 7:16 84:9 85:1	experimentation (1) 75:8	feed (2) 136:20 137:13	116:17 126:19	force (1) 77:11
138:6	explain (3) 58:17 80:7 108:7	feel (25) 34:17,19 35:15 38:25	128:16 129:22	forced (1) 77:15
examine (1) 168:15	explained (2) 65:25 88:18	44:23 47:6 52:4,23	141:1,8 151:12,25	forcing (2) 59:13 77:8
examined (1) 7:13	explicit (2) 46:16 69:25	60:8 69:21 70:2	152:16,22,23	FOREGOING (3) 170:5 171:10,16
example (1) 137:9	express (2) 73:8,11	76:7 89:1,3,10,11	153:15 154:9 155:6	form (13) 85:22 89:23 91:22
examples (1) 92:10	expressing (1) 62:2	97:12 130:5 133:6	155:12 156:10	94:21 98:25 103:2
exchange (3) 153:16 154:10 155:8	extent (13) 29:17 94:14 96:1,7,15	133:11 134:6,6	157:19,19,21 166:3	108:5 121:1 128:23
exchanged (1) 149:21	99:2,5 108:16 111:8	148:10,14 161:22	166:23 167:4	132:10 136:14
excited (3) 20:10,12 79:4	114:9 129:16	feelings (2) 130:11 146:17	five (7) 13:8,22,23 14:5 27:15	157:1 166:16
exciting (1) 21:15	149:23 163:25	feet (1) 34:4	27:22 68:11	format (1) 161:16
exclamation (1) 58:9	eyes (2) 45:10,14	Feliz (1) 22:19	five-minute (1) 37:12	FORTH (1) 171:11
exclude (1) 152:4	face (5) 43:25 46:7 47:15,18	fellow (1) 147:18	flail (2) 67:1,4	forward (3) 74:22 100:10 123:24
exclusive (1) 146:13	49:21	felt (7) 45:3,5 82:15 89:9	flushed (1) 59:15	found (4) 76:12 80:19 89:17
excuse (11) 10:5,17 12:23 28:3	faces (1) 31:12	130:7 139:5 146:4	flashing (1) 59:14	109:3
34:8 45:9 49:14	facility (1) 21:11	fer (1) 51:2	flight (1) 58:9	foundation (7) 94:14 107:10 123:17
119:4 124:4,6 167:3	facts (1) 172:5	fiance (15) 107:15,16,25 108:21	flirt (2) 147:5,24	130:21 144:9
executed (2) 161:13 170:7	fair (3) 29:21 128:14,15	126:7,9 127:9 128:6	flirtation (2) 147:9 149:6	145:23 158:12
executive (2) 143:6,7	fairly (1) 163:12	128:9,13 129:1,5	flirtatiousness (1) 149:2	four (7) 97:24 125:10,11,15
exercise (1)	familiar (6) 12:1 14:25 20:13 26:2	130:5 153:8 163:22	flirted (1) 91:3	126:1 135:17
	78:1 161:21	fight (4) 82:23 83:2,7,11	flirting (3) 150:19,23 151:4	140:16
	family (11)	file (2) 27:5 160:20	flirty (1) 35:18	frame (3) 27:12 146:25 147:1
		filming (2) 64:8 148:5	Flo (5) 14:14 15:21 20:1,5	friend (3) 22:21 55:16 76:25
		Final (1) 70:15	24:4	friendly (4)
		finally (2) 29:23 73:13	flooded (1) 135:7	

16:19 18:19 85:20 86:19 friends (8) 16:11 38:3 86:2 151:3 158:17,19,21 160:13 front (3) 66:13 117:11,12 frustrated (1) 61:4 frustrations (1) 62:16 fuck (1) 66:9 full (2) 7:20 108:16 fun (2) 78:24 148:24 funny (1) 76:12 further (4) 80:10 146:10 156:15 157:16 future (3) 123:21 125:23 163:8	gentleman (2) 52:12,17 gesture (1) 40:11 gestures (2) 8:21,22 getting (12) 31:12 42:18 51:21 61:22 79:4 93:10 107:19 112:4 144:2 148:10 161:25 166:9 Gibbs (44) 1:16 2:9 5:3 6:8 7:11 7:18,22 9:16 14:25 20:13 37:21 38:15 39:4,16 40:10,15,20 40:21,21,22 41:5,11 43:2 58:12,12 60:17 63:3 75:12 79:16,19 79:23 84:11 85:5 88:6 99:24 103:21 135:21 156:7 163:22 164:18 165:15 168:23 170:12 172:24 GIBBS2 (1) 42:22 GIBBS4 (1) 49:15 GIBBS6 (1) 54:11 Gibson (2) 4:3 7:5 gig (1) 47:3 girl (2) 30:22 134:10 girlfriend (8) 64:1 127:2,6,8,16,25 128:6,10 give (8) 22:12 81:15 92:21 112:2 114:6 139:23 141:7 153:22 given (2) 130:11 163:8 giving (1) 122:22 glass (1) 32:6 glitter (5) 50:19 73:21 74:9,11 74:12 go (31) 8:16 32:1,2,25 33:12 35:7,12 45:4 49:9 55:5 57:17 65:23	68:19 71:2 74:1 75:7 80:16,19 81:1 89:8 97:23 100:10 120:17,22 134:14 137:21 146:10 151:17 154:15 155:24 167:8 God (1) 148:7 goes (3) 97:12 104:24,25 going (80) 8:18 14:14 29:4,21 31:10 33:7,12 34:22 37:13 51:23 57:16 59:12 62:23 74:19 76:18,24 79:9 86:12 88:10 89:7 93:23 94:2,9 95:20 96:6 96:16 98:25 99:1,4 99:9 103:14 104:19 104:20 105:3 108:11,14 109:8,11 111:13 112:2 114:6 116:11,23 119:9 123:17 124:8 127:11,18 128:23 129:24 130:12 131:5,15 134:3 139:20,23 142:7 147:12,14 148:25 149:12 152:2 154:6 154:12,18 155:3,20 155:25 158:10 159:10,11,16,21 165:6,7,9 167:14 168:1,12,25 gold (1) 50:19 good (27) 6:4,20 7:18,19 17:1 18:23 21:9,21 23:10 48:16 49:9 50:14 51:7 54:16 55:7,16 60:25 61:1 63:19 69:8 70:2,24 71:3 79:7 85:3 103:21 165:15 good-byes (1) 18:19 goofy (1) 68:22 gotten (1) 42:17 Gottwald (10) 1:4 6:9 12:2 13:1 16:8 38:12 39:5 121:16 121:24,24	Gottwald's (2) 12:4 39:16 gouge (2) 45:10,14 grain (1) 57:2 grains (1) 57:6 Grand (1) 4:6 grandmother (1) 64:5 graphic (1) 82:20 gray (5) 41:15,19 42:2,4 50:3 great (7) 19:2 23:7 53:22 55:13 68:14,25 69:3 green (6) 41:16,24 49:19 56:1 56:25 57:21 greeted (1) 149:16 Gregory (2) 4:11 6:14 Gretch (7) 54:16,21,24 55:4 56:14,19 57:17 gross (4) 39:2 47:18,25 52:25 ground (2) 134:9 168:20 grounds (5) 93:24 95:21 104:21 166:6 168:13 group (2) 78:24 125:11 groupies (1) 60:4 grow (1) 147:12 growing (2) 69:19 147:10 guess (4) 47:25 70:3 142:15 165:15 guests (3) 76:21,22,23 guitar (1) 76:24 guitars (3) 73:20 76:3,4 gun (4) 65:20 66:3 77:15 134:7 Guns (1) 76:24	guy (3) 25:25 59:20 76:16 guy's (2) 54:11,14 guys (2) 35:20 130:12 <hr/> H <hr/> H (1) 5:6 ha (6) 39:2,2,2,2 47:14 48:2 hacked (1) 144:1 hacker (1) 143:25 Hah (1) 52:8 half (4) 18:3 113:5,8,9 hall (1) 154:16 Hancock (2) 29:16 73:16 hand (1) 40:11 handle (4) 80:18 135:12 137:22 137:23 handles (1) 134:2 hands (1) 50:21 hang (5) 16:16 19:11 21:20 38:4 58:24 hanging (3) 21:19 24:18 68:23 happen (2) 32:20 68:18 happened (3) 25:13 76:15 153:5 happening (3) 32:11 139:6 144:13 happens (1) 75:10 happy (5) 16:24 23:9 47:14 63:22 75:5 harass (1) 147:5 harassing (3) 135:8 163:21 166:7 harbor (1) 145:3 hard (5) 32:25 61:10 66:14 90:2 148:20
--	--	--	---	---

Harris (1) 59:6	75:1	humans (1) 80:14	5:19 93:25 95:22 96:8 96:17 99:2,6 100:9	125:16 163:1
hate (2) 138:19 145:3	Hmm (3) 43:11 45:16 116:6	hundred (1) 15:24	110:7 118:16	iPhones (8) 116:7,12 117:3 119:23 120:1 122:20 123:14,16
head (4) 12:24 77:15 129:14 148:6	hockey (1) 147:13	<hr/> I <hr/>	138:12,22 141:17 142:6 158:11 159:13 161:9 162:8	iPod (1) 73:2
health (1) 36:16	hold (5) 22:15 55:18 116:11 146:21 163:7	idea (3) 45:19 61:2 65:20	initial (2) 13:15 140:1	Irene (12) 59:2,13 60:20,21 64:9 65:23 67:18 143:1 143:10,22 144:19 144:20
hear (19) 25:13 32:9 34:15,25 56:6 62:5,8 77:19 80:1 81:6,10,15 82:5 84:2,5 87:10 87:12 134:9 161:24	holds (1) 163:1	identification (1) 40:17	initiation (5) 127:3,6,16,19 129:22	irrelevant (2) 138:5 163:21
heard (20) 8:15 24:20 32:7 38:12 57:12 59:18 65:1 67:14 77:24,25 79:7 79:23 80:22 81:2 88:22 93:18,21 131:12,16 139:16	Hollywood (2) 39:12,12	identifying (1) 161:9	inquiry (2) 87:24 88:13	issue (1) 72:3
hearing (11) 22:15 24:10,14,16 36:3 37:9,22 66:13 79:3 80:23 166:10	home (10) 22:12,20 33:12,13 38:10 63:14 68:15 79:20 109:5 149:20	identity (1) 74:11	inside (5) 39:21,23 40:9,11,12	issues (1) 146:4
held (7) 2:9 74:20 84:15 124:10 154:20 156:2 165:11	hometown (2) 51:10 68:3	Iggy (1) 76:23	instance (2) 38:19 65:11	items (1) 11:8
hello (3) 18:19 85:4 103:22	honest (4) 96:22 97:11,13 166:8	im (1) 57:16	instances (1) 58:13	<hr/> J <hr/>
hello/good-byes (1) 22:11	honestly (1) 153:4	ima (1) 57:17	instruct (10) 94:2 95:25 102:7 111:13 131:5 139:20 152:2 154:12 159:16 168:12	J (1) 14:13
help (3) 62:22,25 74:23	hook (2) 78:14 144:2	image (2) 44:20 82:20	INSTRUCTED (1) 5:13	Jack (1) 31:23
helped (3) 82:19,22 149:19	hope (1) 93:14	imagine (1) 65:2	instruction (6) 96:6 102:3 112:3,8 114:7 139:24	James (1) 64:2
Hey (3) 66:5 76:17 140:3	hoped (1) 139:12	immediately (1) 66:8	instruments (2) 55:5,6	January (12) 10:5,23 28:4,6,9,12 28:15,22 29:5,14,20 39:5
high (1) 146:6	horrible (1) 37:10	implicates (1) 110:25	interact (5) 13:5 16:2,8,18 75:4	Jeff (6) 6:20 105:17 106:2,9 164:3 167:16
highly (4) 98:21 145:4,12 159:21	hospitable (1) 51:8	implicating (1) 111:3	interacted (2) 13:10 86:11	JEFFREY (1) 3:7
Highway (3) 66:20,23 67:18	hospitality (1) 51:3	impressed (1) 98:13	interacting (1) 88:25	Jessica (1) 64:1
Hillhurst (1) 22:18	hostess (2) 42:16,20	impressive (1) 98:17	interaction (2) 16:4 87:5	Jessie (1) 14:13
Hills (1) 39:12	hot (3) 51:20 147:17,21	inappropriate (2) 98:20,21	interactions (8) 16:10 18:16 19:4,9 23:1,6 93:3 130:8	job (22) 1:23 9:20,23,25 10:2 10:8,16,21,24,24 11:4,6,7,11,17,21 13:25 26:23 32:17 55:16 101:17 143:5
Hilton (1) 82:21	hotel (7) 33:1,3,5,14 35:9 69:2 70:4	incident (12) 35:9,16 67:1,7,12,16 82:12 150:16 152:11,17,19,24	interrupting (1) 110:15	join (2) 88:10 89:22
history (3) 122:3 123:13 130:25	hour (2) 31:13 58:21	incidents (7) 38:16 69:12 151:7,13 151:20 153:5,9	invaded (1) 147:10	joining (1) 101:22
hit (1) 121:8	hours (8) 13:12,24 14:6 27:16 27:23 105:5,9 164:5	include (1) 106:21	invoke (1) 101:23	joint (16) 94:2,4,8,16 95:23,24 99:3,12,19 100:8,22 101:12,24 111:5,10 161:5
hitting (1)	house (21) 30:7 31:9 33:6 39:13 49:7 50:15,16 63:18 64:17 65:6,12 66:14 66:23,24,25 67:17 67:25 68:17,20 70:12 78:23	incorporate (1) 84:19	involved (8) 11:12,23 26:11 29:4 72:15,17 95:17,19	joke (2) 51:24 52:1
	houses (8) 39:4,8,10,11,14,16,18 112:25	individual (3) 12:1 15:1 98:14	involvement (1) 11:14	
	huge (2) 57:4,13	individually (1) 101:18	involving (1) 65:8	
		individuals (7) 92:3 105:23 124:21 124:23 125:10,12 136:4	iPhone (10) 116:4,17,18,19 117:8 119:11 120:8 123:8	
		information (18)		

joking (1) 148:20	42:14 47:4 51:15 52:16 55:14 58:25 59:4,12 60:23 61:6 61:18 64:6 65:8,12 65:14,19 66:5 67:19 69:4,5,12 70:4,8,23 71:5 72:4,7,8,19,22 73:3,7,16,19 74:8 77:4,9,11,19,24,25 78:6,16 79:3,19 80:22,23 81:12,16 81:25 82:2,5,5,8,20 85:9,14 86:3,18 87:1,15,21 88:25 89:3 90:11,14,22 91:2 93:2,3,8 96:5 96:20 107:9,19 108:2 125:3 126:11 130:10 131:1,22 134:1,3 135:5 138:18 139:7,8 140:23 141:6,12,18 142:3,22 143:13,23 144:8,21,23 145:3 145:12 146:20 149:17 150:1,6,16 150:23 151:4 152:11,20 153:13 153:17 156:11 158:2	50:23 know (143) 8:7 9:14 12:4,24 15:16,20 17:14,18 18:24 19:11 23:7 24:1 26:17 27:24 28:5,21,24 29:11,13 31:7,14,15 32:8,12 32:19 33:13 37:1,7 37:9 38:10 39:4 41:18,18,23 42:1 43:7,16,21,25 44:3 45:20 47:3,5 49:5,9 51:16 52:17 53:8 55:22 59:19 60:4,11 60:12 61:2 62:19,24 62:25 65:2 69:6,24 73:20,21,23 74:6,12 74:17 75:9 76:5,21 76:23 77:2,16 78:4 78:7,20 81:5 82:15 82:16,17 85:16,17 87:10 93:9 94:20 95:14,14,15,17,19 96:4,11,16,23 97:3 97:4,6,9,11,13 98:5 98:9,15,24 104:23 108:8 109:4,11,14 116:1,14,16 119:24 120:2 121:14,15 129:15 130:24 131:3,18,23 133:13 134:20 135:6,6,7 138:21 143:5 146:19 147:11,17 147:23,23 148:8,12 148:14 149:19,25 156:19 157:24 158:1 163:10 165:20 167:11	124:21 125:12 140:17 149:9,10,19 149:20,25 150:4 152:25 153:2 Kojak's (1) 69:17 Kojoy (2) 49:21,24	141:5 lawsuits (25) 95:6 96:21 98:6,8,10 126:23 127:3,7,17 127:20 130:6,14 131:4 133:14,14,15 138:13,18,22 141:1 141:3,9,15 142:13 144:24
joyous (1) 16:24			lawyer (2) 101:8 140:17	
July (1) 28:3			lawyers (12) 96:8,10 107:8,13 114:1,22,25 115:3 139:22 140:13 152:16,22	
jumping (2) 31:11 63:1		L	lay (1) 158:12	
June (8) 1:18 2:4 6:1,5 48:18 48:22 169:3 171:22		L (3) 1:22 2:11 171:25	Lbcin (3) 48:7,15 51:3	
K		LA (1) 164:18	Leading (1) 40:2	
K (8) 41:6 118:13 119:3,6 120:7,18,23 121:5		label (2) 78:19,20	leak (1) 27:6	
Kasz (15) 1:4 10:12,13,17,21,25 11:11,19 12:23,24 13:3,7,11 14:8 100:23		labeled (2) 120:18,23	leaked (1) 143:25	
Katherine (10) 4:8 7:5 74:25 84:20 99:4 105:17 106:3,9 139:25 167:16		lacks (1) 94:13	leaned (1) 149:17	
Katie (1) 64:10		lady (1) 148:25	learn (1) 138:12	
Katy (2) 14:13 144:1		Lagan (7) 58:25 60:18,19 64:6,7 64:8 148:5	learned (14) 109:8 111:10,15 113:3 114:8 129:22 130:6 132:7,18 133:1 141:1,9,14 142:13	
keep (12) 14:14 33:1 74:19 81:3 110:15 121:23 126:4 129:14 130:12 134:3 161:8 164:11	Kesha's (15) 26:20 55:10 60:19 61:13 64:23 68:2 71:12 74:15 75:24 78:8 80:17 129:9 137:23 144:4 147:8	laid (2) 51:25 52:5	leave (4) 72:11 162:3 164:12 168:19	
Kemos (1) 10:16	Keys (2) 55:9 77:1	large (3) 33:10 115:16 159:19	leaving (3) 48:25 129:10 148:11	
Kemosabe (23) 4:4 7:6 9:19,23 10:3,7 10:8,14,18 11:18,22 13:16 14:1,17 26:10 94:7 95:2,5 98:14 100:23 102:11 131:22 142:13	kia (6) 51:12,22,23,25 148:24 149:1	laser (1) 74:1	left (7) 22:17 31:14 34:6 38:7 38:9 66:11 67:17	
kept (3) 29:15 63:1 121:19	kid (1) 16:24	lasers (6) 73:21,23,25 74:3,5,6	legal (5) 6:14 94:22 95:11 99:23 139:13	
Kesha (150) 14:14 15:1 18:5,10,12 19:5,17,22 20:3,6 20:14 21:23 22:5,8 23:2,11,15,24 24:20 26:2 27:1,18,20 28:11,22 31:11 32:22 33:5,6,12 35:17 36:11 37:4 38:16,24 41:10 42:5	kill (1) 134:13	lasted (1) 167:3	length (1) 163:9	
	killed (1) 134:12	lasting (1) 68:10	Lepera (6) 3:8 6:25 100:19 101:7 130:12,20	
	kills (1) 54:5	late (7) 12:11 15:9 21:3 29:8 84:14 109:6 163:12	Leslie (4) 1:22 2:11 6:16 171:25	
	kind (1) 152:9	laugh (2) 39:2 60:15	let's (12) 71:2 74:17,18 101:17 107:16 110:1 133:17 154:1,15,15	
	kit (1) 53:22	laughed (1) 19:10		
	knew (8) 45:20 59:16 61:7 66:2 80:6 107:13 108:9 144:14	laughter (2) 19:1,14		
	kno (1)	law (1) 105:1		
		LAWS (1) 170:6		
		lawsuit (23) 107:20,22 108:2 126:10 128:17,22 129:5,22 130:22 131:12,17,18,23 132:7,19 133:1,5,8 133:10 134:20 138:12 140:23		
		knows (3) 96:1 97:22 130:15		
		Knupp (3) 3:3 6:11,21		
		Kojak (19) 18:8 22:2 32:23 33:12 49:2,25 69:4 124:17		

155:24 162:3 level (1) 16:4 licking (1) 31:11 life (5) 48:7,14 122:19 139:10 145:5 liftoff (1) 58:2 liked (1) 57:6 limit (1) 126:4 limited (1) 124:22 limo (1) 22:24 line (13) 80:14 88:6 131:16 135:23 138:5 166:5 172:8,10,12,14,16 172:18,20 lineage (1) 80:9 links (1) 80:10 list (1) 14:23 listed (1) 67:21 listen (2) 76:2 162:19 lists (1) 157:6 literally (2) 45:13 134:14 litigation (1) 96:5 little (180) 3:16 5:3 7:1,1 35:22 40:2 48:12 64:19,25 66:14,17 69:21 70:10 71:2 81:7 84:21 85:2,8,23 86:14 87:25 88:4,9 88:14,18,20 89:24 90:12,19 91:7,13,18 92:1,9,14,20 94:4,9 94:18 95:1,15,18 96:3,12,20 97:1,18 97:22 98:3,13,17,22 99:9,16,21 100:1,4 100:10,14,15 101:3 102:4,13 103:8,12 103:20 104:12,23 105:6 107:1,12,24 108:6 109:10	110:10,18 111:2,19 112:6,11 115:10,12 117:1,18,20 119:2 119:12,14,22 120:6 121:2,19,22 122:4 122:10,16,20,24 123:1,5,15,19 124:1 124:13,24 127:23 128:3 129:3 130:3 130:18,23 131:8 132:24 133:9 134:24 135:24 136:3,8,15 137:3,8 137:16,20 138:7 139:14 140:8 141:4 142:2,11,21 144:11 145:8,16 146:1,16 147:2 150:9 151:6 151:16,23 152:6,8 153:20 154:5,14,25 155:21,23,24 156:6 157:3 158:14 159:7 159:14,18 160:9,12 160:16,25 161:4,11 161:15 162:6,9 163:6 164:3 165:1,3 165:6,14 166:2,12 166:22 167:1,17,21 168:6,8,15,22 live (2) 74:2 76:6 lived (1) 76:13 lives (2) 164:18,18 LLC (1) 1:5 located (2) 6:11 63:13 locations (1) 70:11 lock (4) 39:25 40:4,7,12 locked (4) 33:4 40:6,8 149:15 locks (4) 39:19,21,23 40:9 long (19) 9:20 17:25 18:25 21:6 34:11 68:9 104:18 104:24 105:7,11 110:8 113:2 114:24 116:5 126:16,18 134:14 135:15 166:4 longer (2) 148:18,18 look (12)	49:20 50:8,14 60:16 74:6 117:10 120:18 120:22 137:13 147:21 148:22 160:18 looked (4) 56:19,20 59:16 106:21 looking (3) 45:1 118:19 148:24 looks (2) 56:14 100:17 Los (8) 1:17 2:10 4:7 6:1,12 22:19 58:6 132:1 lose (4) 61:25 62:2,6,20 losing (1) 146:9 lot (26) 19:1,10,13,14 21:18 21:18,19 36:11,14 50:15 53:24 58:23 61:4,9,18 62:23 69:3 70:16 74:3 76:2 78:15 81:4 83:18 84:1 87:10 148:5 love (7) 33:9 65:20 66:3 76:19 134:3 139:8 148:3 loved (2) 69:20 147:25 Loving (1) 83:25 Lukasz (3) 1:4 6:9 12:25 Luke (125) 1:4 12:2,8,10,15,18 13:2,6,10,17,19 14:1,3 15:25 17:23 18:5 19:5,19,23 20:3,7 22:2,16,16 23:2,12 24:2 26:11 26:14 27:8,11 28:24 32:22 38:6,7,8 49:2 49:21,24,24 58:19 60:21 62:5,8 63:24 64:11 65:24,24 67:1 67:4,7,10,12,14,19 71:5,6,14,17,24 72:16 73:15 74:14 77:19 82:2,17,17,19 82:22,24 83:1,4,8 83:10,13,15 84:3,6 94:5,8 96:5,21 107:15,20 108:2,20 109:18 110:2 111:6	111:15,21 113:4,11 113:14,22,23 114:4 114:18 115:14,22 122:8 123:7,12 124:15 125:3 126:7 126:11 129:13 130:10 131:1,22 133:18 134:9,12 135:7 138:21 139:15 140:12,21 141:5,10,16 143:3,8 144:2 Luke's (17) 26:17 30:6,12 58:19 63:12,18,19 64:17 65:6 66:23 67:25 70:12 79:20 83:19 93:3 137:22 143:24 lunch (1) 16:17 lunches (2) 19:12 63:21 lyrics (2) 61:5 79:1 <hr/> M <hr/> ma (1) 57:3 Machine (3) 65:20 66:3,6 maintained (1) 39:5 major (1) 47:3 majority (2) 26:19,22 making (22) 24:7 25:7 27:3,5 35:21 36:19 37:9 40:11 66:2 74:17 93:2 99:13 100:6,11 102:24 130:13,16 134:6 136:5 137:14 148:17,24 Malibu (26) 30:6,12,13,13,14,15 39:13 42:14 58:19 62:13 63:12,18 64:17,22 65:6,12 66:24 67:25 68:1 70:7,10,12,13,23 78:23 79:20 man (3) 53:8 140:3 149:21 man's (2) 52:24 53:2 manager (5) 32:10 36:19 37:6	61:23 93:9 managers (2) 91:21 92:3 manner (7) 87:19 90:5,6,15,24 120:2 141:19 manufacturer (1) 54:3 March (1) 29:9 mark (4) 40:14 56:19 88:14 160:4 marked (5) 5:23 40:16,19,20 106:22 Martin (1) 28:25 mated (1) 80:14 matter (4) 6:8 85:9 103:1 160:14 matters (3) 65:7 81:13 89:1 Max (1) 28:25 McALLESTER (1) 3:12 meal (1) 65:15 mean (25) 41:9,21 45:12,16,22 46:9 48:11 50:12 51:6 54:9 55:3 56:5 56:17 57:5 58:3 71:2 76:6 93:7 98:17 103:4 131:9 150:8 151:5 161:6 167:20 means (6) 41:19,23 44:18 53:15 127:19 137:5 meant (15) 45:13 51:16 54:20 55:22 56:18 73:23 73:24 74:8,8,10 108:4,8,8,9 146:21 media (21) 82:6,11,15,18 96:14 96:16 97:7,10,13,16 98:4,8 129:7 131:13 131:16 133:2,16 135:5 138:3 146:4,7 meet (5) 104:18 161:25 162:4 164:5,9 meeting (2) 12:20 168:11
---	---	--	--	---

meetings (1) 107:5	73:14 103:25 113:25 114:21,25 115:2	money (18) 1:4 10:12,13,17,22,25 11:11,20 12:23,24 13:3,7,11 14:8 22:15,16 55:5 100:23	164:22 165:2,4,22 166:16,23 168:4	need (9) 9:4,13 10:5 22:15 70:17 88:17 102:20 114:14 134:3
member (1) 78:24	metaphorically (1) 74:5	Monica (17) 32:10,23 36:19,20,21 37:4,5,8 59:1 61:24 64:9 65:18 67:20 73:16 80:25 81:19 87:3	MP3s (1) 162:18	needed (2) 32:1 114:13
members (1) 63:24	mic (1) 34:23	Monica's (1) 37:1	MSK (10) 94:11,15 99:9,10 100:11 101:5,7 102:10 104:13,14	needs (4) 27:3 87:25 110:13,20
meme (1) 134:7	microphone (2) 75:2 81:9	month (2) 18:2,3	mug (1) 124:6	negative (1) 46:6
memory (19) 9:2 15:21,22 18:2 20:3 22:4 28:17 33:15 38:1 71:20 78:22,25 102:1 117:4 128:18 131:11 132:1 133:2 143:14	mid (1) 12:11	months (1) 17:6	multiple (1) 122:16	nervous (1) 35:17
mention (3) 24:20 112:18 151:19	middle (5) 1:2 75:4 109:14 164:7 168:17	morning (5) 104:6 105:12 106:7 106:11 109:4	music (9) 4:4 7:7 32:9 56:6 74:3 74:9,12,17 79:20	never (14) 36:21 45:7 51:25 52:5 88:22,22 91:14 93:17 107:8 133:14 138:19 140:6 148:25 151:10
mentioned (17) 9:10 33:17 35:9 37:21 51:19 61:20 70:1 76:22 81:21 124:16 139:9,11 140:16,20 150:4,15 151:25	mind (4) 146:14,22 150:16 152:3	mother (1) 96:21	musicians (2) 11:16 69:8	new (18) 3:6,6 54:23 55:4,5,7 55:23 58:1,5 73:22 73:22 76:9 132:1,8 132:20 147:20 161:6,13
mentioning (2) 139:8 151:13	minor (1) 131:2	motion (1) 160:20	mutually (1) 146:13	n (5) 3:1 4:1 5:1 76:20,24
merit (1) 133:13	minutes (2) 105:13 124:7	move (1) 98:22	nail (1) 61:4	name (17) 6:14,20 7:20 12:5,7 14:20 37:1 75:6 85:8 118:25 119:8 119:17 120:19 128:8 171:21 172:1 172:3
message (52) 41:24 43:3,7,8,10,22 44:8,11,14,20 45:6 45:9,15 46:21 47:1 47:11,17,22 48:2,6 50:18 51:11 52:8,11 52:21 53:11,12,21 54:4,22 55:1,25 56:12,13,15,21,24 57:15,21 58:8 115:24 119:16 124:21 125:4 154:10 155:7 156:11 157:7,17,20 157:21,22	mischaracterizes (1) 129:25	moving (2) 101:2,14	named (2) 12:1 15:1	name (17) 6:14,20 7:20 12:5,7 14:20 37:1 75:6 85:8 118:25 119:8 119:17 120:19 128:8 171:21 172:1 172:3
messages (37) 5:8 41:19 42:2,4,10 43:24 45:23 46:2 48:21 49:19 50:2 53:20 54:15 55:20 115:19 117:6,25 118:9,21,21 120:25 121:15 122:7 123:7 123:11,20 124:14 125:14,19,23,25 135:8 144:2 156:18 157:10 158:2 163:2	missing (4) 107:18 112:5 114:11 114:11	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	names (1) 24:1	nice (10) 86:3,6,9,18,21 87:2,4 89:21 130:16,16
met (15) 12:9,10,15,16,19 15:3 15:6 27:4 72:25	misspeak (1) 33:23	move (1) 98:22	Nashville (28) 1:3 3:15 30:11 32:22 35:10 45:16,20,25 48:24,25 49:8 51:8 55:9 57:9 58:6 68:2 68:7,10,13 69:11 76:3 81:21 132:3,8 132:20 149:13 150:16 152:20	nicest (1) 37:8
	misspoke (1) 33:25	moving (2) 101:2,14	natural (1) 50:14	Nicole (2) 81:1 87:7
	misstates (2) 90:18 142:8	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	names (1) 24:1	night (8) 24:20 32:18 40:6 48:16 66:18 69:24 70:2 129:10
	misstating (1) 92:17	move (1) 98:22	named (2) 12:1 15:1	nine (1) 157:13
	Missy (1) 12:21	moving (2) 101:2,14	names (1) 24:1	nite (2) 48:7,16
	Mitchell (3) 3:3 6:11,21	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	Nashville (28) 1:3 3:15 30:11 32:22 35:10 45:16,20,25 48:24,25 49:8 51:8 55:9 57:9 58:6 68:2 68:7,10,13 69:11 76:3 81:21 132:3,8 132:20 149:13 150:16 152:20	nod (1) 8:24
	Mitzell (1) 64:10	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	names (1) 24:1	nodes (1) 8:23
	mix (1) 114:14	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	Nashville (28) 1:3 3:15 30:11 32:22 35:10 45:16,20,25 48:24,25 49:8 51:8 55:9 57:9 58:6 68:2 68:7,10,13 69:11 76:3 81:21 132:3,8 132:20 149:13 150:16 152:20	noise (3) 74:1 81:4 97:12
	Mmm (1) 56:2	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	natural (1) 50:14	noises (1) 73:25
	molds (1) 60:4	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	naturally (1) 76:14	nonspeaking (1) 138:8
	mom (3) 71:12 72:9 139:10	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	nature (7) 8:7 24:8,11,17 25:10 25:19 37:23	Nope (1) 43:25
	moment (4) 18:11 19:25 73:4 152:25	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	Neal (1) 7:3	NORTON (1) 3:12
	Monday (9) 6:1 48:16 104:5,17,18 105:5,14,16 151:20	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	near (3) 25:13 86:1 91:6	note (5) 88:11 89:19 135:23 138:4 161:10
	monday (2) 48:7,15	Movit (103) 3:7 5:3 6:20,21 7:17 27:13 37:12,20 40:3 40:10,14,18 64:21 65:3 70:18,21 74:25 75:11,18,22 77:7 79:8,18 81:3,10 84:8,17 86:12 87:23 88:5 89:19 90:9,18 91:17 92:13 93:20 95:11,16 96:19 98:18,20,25 99:16 99:19,23 100:2,5,7 100:13 101:22 102:10 103:10 107:10 115:9 116:20,23 119:9,20 120:4 122:9 123:17 124:22 127:11,18 132:11,23 133:7 135:21 136:7 137:1 137:6,11,18 138:4 141:3 142:17,20 144:9 145:14,23 146:15,25 150:7 151:5,15 153:17,23 157:1 159:10 160:6 160:10,15 161:10 161:12,17 163:12	necklace (2) 75:1,1	notes (1) 106:14

<p>notified (1) 29:15</p> <p>Nourafchan (2) 3:9 6:24</p> <p>nude (2) 82:12,13</p> <p>number (11) 118:24 119:8,18,19 120:12,13,15,19,24 121:4 143:25</p> <hr/> <p>O</p> <p>o0o (1) 6:3</p> <p>OATH (1) 171:12</p> <p>object (31) 86:12 89:23 91:22 93:23 95:11,20 98:25 99:1,4 101:9 103:2 104:19,20 107:10 116:23 119:9 123:17 127:18 128:23,24 129:24 131:5 132:10 142:7 146:15 157:1 158:10 159:11 165:22 166:5,16</p> <p>objection (52) 8:20 27:12 40:2 64:19 64:25,25 85:22 88:10 89:22 90:9,16 92:6,16 94:21 95:16 97:17 98:1,11 99:16 99:17,22 100:5,12 101:4,4,5,22 102:3 107:23 108:5 110:11 119:20 120:4 121:1 130:18 130:20 132:23 133:7 134:22 135:23 136:7,14 137:1,6,11 138:4 144:9,10 145:1,14 145:23 151:14</p> <p>objections (9) 84:20 89:19 90:8 91:1 99:11,14 138:7 171:13,18</p> <p>objects (3) 101:22 154:7 155:4</p> <p>observation (1) 87:3</p> <p>observe (3) 31:18 90:7 92:2</p> <p>observed (9) 77:8 83:21 86:20 87:2</p>	<p>90:14 91:9,10,14,21</p> <p>observing (1) 72:6</p> <p>Obviously (1) 84:8</p> <p>occasion (1) 31:25</p> <p>occupation (1) 9:17</p> <p>occur (1) 20:19</p> <p>occurred (1) 139:21</p> <p>October (1) 126:17</p> <p>offend (1) 60:13</p> <p>offering (1) 76:1</p> <p>office (1) 16:16</p> <p>offices (2) 104:13,14</p> <p>oh (15) 33:25 35:19 44:8 46:2 49:10 51:23 70:2 72:12 126:1 127:24 142:15 147:17,20 148:6 149:21</p> <p>Ok (1) 50:3</p> <p>okay (188) 9:1,8 10:2,11 13:5 14:20 15:5,12,20 17:5,10,25 18:7 23:18 24:4,16 25:18 25:21,24 26:8,14 27:10 33:22 34:17 35:1,5 36:6 39:25 40:25 41:18,21 42:1 43:10,16,21,24 44:17 46:6,9,16 48:6 49:14,24 50:7 51:16 52:15,20 53:2 53:5,14 54:15 56:5 56:12,17 57:5,24 58:8 71:11 72:24 73:7 74:17 78:10,13 85:8,13 86:3,8 89:7 89:15 90:4 92:10,16 93:6,20 94:9 95:5 95:19,20 96:17 97:17 98:16 101:10 102:6,14,17 103:9 103:12 104:3,7,15 104:17 105:3,11,14 105:20 106:3,17,20 107:4,7,16 108:3,10</p>	<p>108:20 109:17 110:1,5 111:24 112:10 113:10,13 113:18,25 114:4,24 115:2,6,13,19 116:7 116:14 117:5,10,24 118:4,9,12,16,19 121:10 122:5,22 123:10 125:2,18,21 126:13,18,22 127:1 127:24 128:16,19 128:21 131:3 132:2 132:4,14 133:17,21 134:16 135:18 136:4,22 138:11,16 141:8 142:24 143:9 143:19 145:11 146:2 150:14 151:1 151:19,21 152:2,15 152:19 153:8,11 154:4,17 155:18 156:17,24 157:9,12 159:3 162:16 163:12 165:4,20 166:3,13 167:25 168:21,22</p> <p>old (9) 54:23 55:4,4,5,18,23 55:24 57:3,13</p> <p>Olympic (2) 2:9 6:12</p> <p>once (6) 38:8 39:3 46:12 59:15 126:15 162:1</p> <p>one-night (1) 24:24</p> <p>one-on-one (1) 36:9</p> <p>ones (4) 54:16 55:7 57:7 156:21</p> <p>ongoing (1) 96:4</p> <p>online (1) 82:13</p> <p>onslaught (1) 140:1</p> <p>open (3) 62:19 149:13 163:7</p> <p>openly (2) 55:14 61:24</p> <p>opinion (4) 37:8,11 49:8 50:16</p> <p>order (4) 62:24 156:12 160:23 161:14</p> <p>ordered (2) 62:25 81:23</p>	<p>orders (2) 102:23 161:22</p> <p>original (1) 111:22</p> <p>Orlando (1) 134:11</p> <p>outlines (1) 133:22</p> <p>outside (10) 19:11 32:12 33:7 34:4 39:22 89:19 135:22 138:6 154:21 156:3</p> <p>overall (1) 71:3</p> <p>overhear (1) 38:11</p> <p>overheard (4) 36:14,18,22 59:20</p> <p>overnight (1) 113:8</p> <hr/> <p>P</p> <p>P (4) 3:1,1 4:1,1</p> <p>p.m (39) 2:5 6:2,6 37:14,16,16 37:18 42:7,10 48:18 79:10,13,13,16 103:15,17,17,19 113:24 124:9,12 154:19,21,21,23 156:1,3,3,5 163:14 163:19 164:16,25 165:10,13 167:3,4 169:1,5</p> <p>p/k/a (1) 1:4</p> <p>Pacific (3) 66:19,23 67:18</p> <p>page (27) 5:2,7 41:5 42:6,22,23 42:24 43:3 48:17 49:14,15 54:11 56:1 56:8,25 58:9 113:16 117:11 157:14,19 172:8,10,12,14,16 172:18,20</p> <p>PAGE/LINE (2) 5:13,20</p> <p>pages (3) 1:7 41:12 157:13</p> <p>pajamas (1) 61:10</p> <p>pantomiming (1) 40:11</p> <p>Park (1) 31:9</p> <p>part (8)</p>	<p>47:10 74:11 86:5 101:11 115:16 148:1 160:17,19</p> <p>partaking (1) 59:9</p> <p>participate (3) 25:15 26:15 105:20</p> <p>participating (3) 106:10 167:18,20</p> <p>participation (2) 26:18,20</p> <p>particular (5) 130:25 132:4,15 133:22 164:14</p> <p>particularly (3) 132:5,15 164:12</p> <p>parties (8) 7:6 100:24 106:7 131:4 161:15 162:4 164:8,14</p> <p>partner (1) 83:22</p> <p>partners (1) 16:12</p> <p>party (7) 8:10 30:22 31:9 94:19 102:24 161:13 164:11</p> <p>partyer/rock-star (1) 30:23</p> <p>partying (1) 31:5</p> <p>patio (1) 24:19</p> <p>patios (1) 38:9</p> <p>Patrick (4) 54:24 55:8,13 76:25</p> <p>pay (1) 42:16</p> <p>paying (1) 138:23</p> <p>PCH (4) 66:13,16,19,25</p> <p>Pebe (30) 1:8 3:13 6:9 7:1,3 69:4,5 71:8,11,13 71:16,23,25 72:4,7 72:14,15,16 73:16 79:23 80:11 81:20 81:23,25 84:2,5 85:9 107:9 126:11 140:24</p> <p>Pebe's (1) 76:13</p> <p>pee (8) 32:7,9 34:7,14 36:10 36:15,16,19</p>
--	---	---	---	--

peed (1) 34:8	phone (47) 22:21 41:2 45:23,25 59:5,14,15 60:9 106:10 113:20 115:15,20,25,25 116:3,6,8 117:9 118:4,10,17 119:7 119:12,16,18,19 120:12,12,15,18,18 120:22,23 121:4,4 121:10,11,24,25 143:25 144:1 155:19 156:18,25 157:4 158:3 163:2	120:8	144:14 166:20 167:8	166:14 167:22 168:1
peeing (1) 34:20	phones (6) 122:12,15,17 157:24 162:25 163:4	places (1) 63:8	Polaroid (1) 59:22	presently (1) 158:3
PENALTY (1) 170:4	photo (2) 23:22 82:13	plaintiff (2) 8:13,14	pop (4) 30:21 74:12 76:23,23	preserve (2) 123:20 125:22
penis (4) 59:8,22 60:3,9	photographs (1) 46:17	plaintiffs (5) 1:6 3:4 5:7 6:22 133:3	portion (9) 20:16 26:5 88:15 118:14,23 119:1,3,6 119:7	presume (1) 115:20
penises (4) 45:1 58:15 60:5,7	photos (2) 82:12 156:22	plan (2) 65:15 81:20	portions (1) 75:23	pretty (6) 45:18,20 59:1 66:14 70:16 105:1
people (29) 16:16 18:25 23:8 24:1 29:3 36:23 38:8,9 42:15 56:6 59:12,14 60:7 74:3 77:25 86:10,21 91:19 92:7 93:1 129:15 134:11 135:7,18 136:20 151:2 157:6 158:24 167:25	physically (1) 83:4	planning (1) 59:16	positions (1) 11:18 22:23 147:19	preventing (1) 72:7
people's (2) 31:12 136:12	piano (1) 68:23	plans (2) 46:3 165:1	possible (2) 39:25 40:4	previously (5) 9:22 80:22 86:24 92:14 163:6
percent (2) 15:24 151:25	pic (1) 91:4	Plant (11) 28:7,16 30:1 34:1,9 59:18 63:5,11 65:21 73:14 80:3	possibly (1) 86:2	primary (2) 162:22 163:2
Perez (1) 82:21	picked (1) 82:11	Plaster (1) 60:3	Post (1) 143:17	printed (1) 118:5
Perfect (1) 162:6	picking (4) 42:14 81:5 82:15 156:11	plastic (1) 33:21	posted (1) 82:21	prior (12) 10:9,24 11:1 71:17 77:21 79:20 92:17 129:25 140:22 142:8,9 163:16
peril (2) 164:2 165:5	picture (13) 42:23 44:24 49:15 50:3 52:11,13,23 53:9 54:10 56:9 59:21,22 60:9	play (6) 32:8 55:10 73:1 76:10 76:17 135:14	pouring (1) 69:16	privacy (1) 88:12
period (9) 10:20 11:3 86:9,19 122:9 134:25 138:22 142:3 148:6	Pitbull (1) 14:14	played (4) 55:10 65:21 77:1 152:12	pouting (1) 80:19	private (4) 25:12 128:25 158:11 159:12
periods (1) 19:1	pix (2) 49:12 59:5	player (2) 76:10,13	power (1) 102:23	privilege (22) 94:1,2,12,17 95:23,24 99:3,5,14,18,19,22 100:11,22 101:5,24 101:25 110:23,25 111:3,5 161:3
PERJURY (1) 170:4	place (20) 6:10 29:25 46:11 49:9 63:7,9 67:23 70:5 70:13 101:10 109:2 109:24 112:24 113:11,15,19 131:24 151:8 160:24 171:11	playing (3) 54:24 68:23 73:5	practice (1) 125:18	privileged (21) 100:8,25 101:11 102:12 103:3 104:8 110:6 111:11 121:18 139:3 151:22 152:4 153:19 154:3,7 155:5,11,15 166:17 168:7,14
Perry (2) 14:13 144:1	placed (1)	playoff (2) 147:13,13	preference (1) 85:5	probably (5) 18:3 24:21 34:3 76:6 129:16
person (6) 30:23 59:6 72:22 90:11 119:17 145:25		pleasant (2) 18:23 19:10	pregnant (1) 64:3	problem (1) 145:6
persona (6) 30:17,20 31:1,19 38:18 69:13		please (44) 6:18 7:9,20,23 8:18 8:19,20,23 9:14 22:11 35:7 42:22 43:2 45:4 55:25 56:13,24 57:24 58:17 70:19 75:9,17 81:3 86:16 87:10,12 87:17,19 88:2 90:21 92:21 94:24 101:14 102:19 116:21 119:4 127:4 129:2 132:12 142:18 147:1 153:24 154:25 157:14	premier (2) 53:24 54:2	problems (2) 9:2 79:1
personally (5) 69:6 75:25 85:16,18 161:21		pleeze (1) 55:19	preparation (7) 28:20 103:25 104:25 106:8,14,18,21	procedural (1) 130:24
persons (3) 37:23,25 38:5		plus (1) 14:22	preparations (1) 28:14	proceed (7) 37:19 79:17 103:19 124:12 154:24 156:5 165:13

proceeding (1) 8:8	purchased (1) 118:6	42:19 118:13	97:13 100:20	30:1 34:1,9 37:13
proceedings (5) 9:5 169:2 171:10,14 171:18	purportedly (1) 163:14	quiet (1) 80:20	128:24 134:19	37:17 40:10 59:18
process (4) 91:20 149:5 159:19 160:19	purposes (1) 101:21	quite (2) 86:13 153:3	148:1	60:17 63:4,11 65:21
produce (1) 102:23	pursuant (1) 94:11	R	realtime (1) 136:20	66:19 70:20 71:11
produced (2) 40:19 117:6	put (8) 49:9 61:20 100:15 118:16 123:21 128:8 163:10 171:12	R (3) 3:1 4:1 29:16	reason (14) 9:4,8 122:5 125:13 163:16 164:24 172:4,8,10,12,14,16 172:18,20	73:14 74:21 75:21
producer (9) 18:8,9,9 22:2,2,3 28:24 36:14 64:13	putting (2) 124:2,5	race (1) 80:15	reasons (1) 23:16	78:18,19,20 79:9,14 80:3 81:5,5,8 84:16 84:17,19 88:5 99:9 100:1,4,16 101:20 101:21 103:14,18 110:17 116:22 123:22 124:3,5,8,10 124:11 127:13 128:4,8 129:21 130:13,17,19,21 132:13 142:19 147:23 154:2,18,20 154:22 155:2,22,24 155:25 156:2,4 161:18,23 163:11 164:20 165:9,11,12 165:22,25 168:25 171:17 172:5
producer/songwrite... 64:14	Q	radio (3) 78:15,16 79:1	recall (108) 8:4,5 12:9,15,18 15:5 15:10 16:20 17:2,5 17:25 18:4,10,15 20:1,6,22 21:1,8,9 21:22 22:5,8,13 23:19,20,23 24:10 24:13,16,23 25:1,5 25:7,9,21,24 36:3,6 37:25 38:16,19 58:13 61:12,16,18 62:1 63:9 64:18,23 65:6,10,11,18 68:9 68:12 69:12 71:22 72:6,16 79:3 80:23 82:8,10 87:1,18 89:2,5,16 90:5 97:15 98:7 109:16 124:18 126:19 127:1,5,14 128:16 128:19 133:4,21 135:4 136:1 138:25 139:5,6,7 142:9 144:22 145:12 149:10 150:21,25 151:9,10,12 152:13 152:23 153:2,4,15 165:17 166:1,4,8 167:6,7	110:17 116:22 123:22 124:3,5,8,10 124:11 127:13 128:4,8 129:21 130:13,17,19,21 132:13 142:19 147:23 154:2,18,20 154:22 155:2,22,24 155:25 156:2,4 161:18,23 163:11 164:20 165:9,11,12 165:22,25 168:25 171:17 172:5
producers (11) 21:20 27:4 28:19 38:2 91:20 92:4 124:17 125:2 140:16 147:18 150:3	qualified (1) 119:10	raised (1) 100:7	received (5) 42:13 43:6 52:21 102:25 103:7	recorded (11) 21:2 26:9 32:18 58:22 63:9,10 65:21 67:24 70:6 76:4 171:14
product (2) 94:1 104:22	quality (1) 53:18	Ram (1) 51:19	receiving (4) 42:19 45:1,18 49:12	recording (91) 9:18 11:1,4,13,15,16 12:17 14:9,11,18,21 15:11,13 16:13 17:9 17:17,18,22 18:21 19:5 20:2,17,19,21 20:22,24 21:13 22:6 23:2,16 26:6,11,15 26:21,24,25 27:1,14 27:17,21,24 28:7,15 29:6,11,23,25 30:15 30:25 31:5,16,17 36:12 39:17,19 47:3 52:2 55:14 60:22 61:13 63:4,17 64:16 64:22 65:5 68:7,13 69:8 70:11,15 71:4 71:9,17,18 72:21 73:15 76:6 78:4 79:20 80:17 86:11 86:21 87:13 91:20 92:3,5,25 93:9,14 149:4,5
production (3) 58:21 70:9 74:14	quash (1) 160:20	random (1) 36:23	recess (3) 37:15 79:12 103:16	recordings (3) 20:11 30:2 77:22
Productions (1) 10:12	question (67) 8:20 56:19 86:13 87:25 88:17 89:8,23 89:25 90:1 91:8,23 92:17 93:24 94:6,22 97:19,21,25 98:2 99:1 100:8,10 102:1 102:8 104:9,10,20 104:20 105:4 110:11,13,20,25 111:17,22 116:20 116:23 119:21 121:20,21 122:14 123:3 124:2,22 125:21 127:12,19 128:24 129:2 131:14 132:11 138:9 139:4 142:18 145:7,15 147:3 152:3 153:24 154:1 155:1 156:7 157:1 166:19 168:6,9,18	rang (1) 144:1	record (89) 6:5,19 7:21,24 8:22 11:24 28:7,16,21,22	Records (17) 4:5 7:6 9:19,23 10:4,7 10:8 11:18 26:10 94:7 95:2,6 98:14 100:23 102:11 131:22 142:13
professional (4) 12:5,7 110:17 164:17	questioning (4) 88:7 138:5 166:6 168:17	rape (1) 139:7		
progression (1) 116:17	questions (17) 5:13 8:18,21 65:1 89:2,5,8 93:15,18 93:20,21 100:14 105:2 108:11 112:15 160:6 163:21	rare (1) 89:8		
project (2) 17:18 29:4	quick (2) 79:8 124:6	reach (2) 40:7,9		
projects (2) 71:19 80:17	quickly (2)	reaching (1) 40:11		
promote (1) 136:23		read (36) 50:18 55:25 56:13,24 57:17,24 70:18,20 75:16,21 97:7,15 98:7 102:2 116:20 116:22 127:11,13 132:11,13 133:14 133:18,25 136:24 137:5,24 138:18,19 142:17,19 153:24 154:1,2,25 155:2 157:9		
Prospect (1) 22:19		reading (10) 57:1,25 80:10 117:20 129:8 132:9,21 133:5 135:1 136:9		
protected (5) 27:6 93:25 94:16 95:22 99:2		ready (3) 29:5 46:12,14		
protective (3) 160:23 161:14,22		real (4) 36:8 68:22 76:14 124:6		
proud (3) 77:2,3,4		really (23) 18:22 19:2,15 20:10 20:12,12 23:10 34:14 63:19 66:1 68:14,16,24 69:7,8 79:4 94:19 96:23		
provided (1) 163:15				
public (8) 30:16,19 31:19 38:17 45:2 52:20,24 69:13				
pull (3) 22:14 65:19 118:21				
pulled (1) 78:15				
pumped (1) 20:12				

red (1) 35:22	42:18,19,21 48:24 49:3,11,12 55:13,14 55:17 57:8 58:18 59:4,7,12,23 62:13 66:13,17 68:14 69:15,16,25 70:8 71:25 72:2,8,14 73:17,18 74:16 78:17 81:22 82:12 140:2 153:1 166:9	reserve (2) 84:8 159:24	34:5 39:11 61:5 62:17,18,18 75:9 84:8,9 88:12 92:24 113:1 114:16 122:23 148:9 151:11 155:20 159:25 161:2 162:7 166:11 168:15	S
redepose (1) 159:25		reserved (1) 118:24		S (3) 3:1 4:1 5:6
Redirect (1) 84:9		respect (15) 84:1 108:20 110:2 126:9 138:3 139:8 145:12,17,19,21 146:17 147:4 152:19 153:11 162:25		safe (2) 33:2 58:9
reduce (1) 84:18				safety (1) 129:10
refer (3) 85:6 128:13 131:4			ripples (1) 47:5	Sandy (1) 78:14
reference (1) 54:13	reminding (1) 114:11	respected (5) 145:4,24 146:11,23 147:6	rock (5) 60:5 73:20,21 76:20 77:1	satirical (1) 47:8
references (1) 63:8	remove (1) 82:20	respectful (1) 87:4	roll (1) 76:20	saved (3) 77:21 121:15 123:12
referencing (1) 57:14	removed (1) 93:5	respecting (1) 101:1	romantic (3) 150:1,5,10	saw (12) 17:2 23:7 32:6 59:24 71:20 129:7 134:10 146:7,8 156:17 157:7,8
referred (3) 42:25 44:21 133:10	rentals (1) 28:18	respond (1) 74:15	room (34) 6:23 8:19 31:24 32:11 33:9,14 34:2,4 35:13 36:12,13,24 38:22 55:11 59:11 65:19 66:11,12 69:4 72:9,11 76:6,6 80:3 81:22 147:22 148:11 149:18 152:21 167:9,11,12 167:13,18	saying (28) 32:8,20 34:2 36:7 47:8 55:6 56:6 57:6 58:5 60:13 72:9 73:19 79:4 82:8,10 87:19,20 110:23 115:24 134:12 135:5 139:5,6,7 147:20 148:25 149:18 161:24
referring (4) 54:10 128:9 141:3 166:23	rented (1) 55:11	responded (1) 54:12		says (32) 41:6 43:3,10,16 45:9 45:15 46:6,21 47:14 47:17 48:2,6,18 50:2,7,18,23 51:1 51:11 52:8 53:11,21 54:4,22 55:18 56:13 57:15 58:9 119:3,6 154:7 155:4
refill (1) 124:6	repeat (11) 86:16 88:2 91:24 96:6 119:4,25 121:21 127:4 129:2 131:13 141:13	response (5) 43:12 44:3,6 111:24 112:7	rooms (6) 16:14 21:11 28:17,19 69:22 76:5	
reflect (1) 75:23		responsibilities (2) 11:25 26:23	Roses (1) 76:24	
reflects (1) 77:5	rephrasing (1) 152:3	responsibility (1) 27:7	Round (1) 15:22	
regard (1) 88:12	replies (1) 41:25	restroom (1) 32:2	routine (1) 62:18	
regarding (5) 65:7 72:3 78:11 108:1 141:5	report (2) 131:12,16	resulted (1) 144:24	rude (13) 87:19 89:17 90:6,15 90:24 91:9,11,15,21 92:7 93:1,4,14	
regards (1) 55:4	REPORTED (1) 1:22	resulting (1) 137:25	rudely (1) 92:4	scanning (1) 73:4
reject (1) 65:3	reporter (15) 6:16 7:8 8:22 40:17 75:20 91:12 99:8 100:3 101:16 109:9 128:2 141:23 166:18 171:3,8	returned (4) 30:11 46:10,11 156:11	rudeness (1) 92:11	scatological (1) 89:21
related (5) 80:8 85:10 103:1 105:2 113:15	REPORTER'S (1) 171:1	returning (1) 66:17	Rugh (1) 44:8	schedule (2) 117:4 164:10
relationship (9) 83:21,24 85:14,15,16 85:25 89:12 139:10 150:1	Reporting (2) 6:16,17	rich (2) 50:8,15	rules (1) 8:15	scheduled (2) 27:25 164:7
release (1) 78:11	represent (1) 85:9	Richter (7) 59:2,14 60:20,21 64:9 65:23 143:1	run (1) 163:23	scheduling (1) 163:17
relevance (5) 88:13 158:13 159:12 159:18 160:7	representing (1) 107:9	rid (1) 51:21	runner (3) 11:2 15:14 17:12	school (1) 146:6
relevant (3) 87:23 159:21 160:18	reputable (1) 76:22	Rida (5) 14:14 15:22 20:1,5 24:4	running (2) 51:24 52:1	scope (5) 89:20 110:22 111:10 135:22 138:6
relieve (1) 32:3	request (3) 55:10 68:2 102:24	ride (1) 22:12	runs (1) 11:7	scratching (3) 69:20 147:25 148:3
remember (58) 18:8 20:4,9,11 22:21 23:15,17,25 31:10 31:11 32:7 33:3,6,6 33:12 34:22 36:24 38:20,23 39:1 42:12	requested (5) 5:19,23 16:5 109:3 162:8	riders (1) 27:3		screen (5) 118:20,23 119:7 121:10,11
	requests (2) 18:18 102:22	ridiculous (1) 129:6		
	resentment (1) 145:3	right (26) 15:22 22:4 33:15 34:5		

screenshots (3) 41:1,3 156:22	seeking (1) 131:9	68:16 171:11	shy (2) 35:18,20	43:25 46:7 47:15,18 49:21
screenshotted (1) 118:6	seen (21) 16:18 31:14 40:22	sets (2) 49:4,6	si (3) 44:14,15,18	Smith (102) 4:8 7:5,5 27:12 74:22
scrolled (1) 157:5	67:4,10 74:2 83:1,4	setting (1) 27:2	side (4) 11:13,15 34:20 66:25	75:5,8,16 85:22
scrolling (1) 157:7	83:10,15 92:7,11	settings (1) 46:12	sign (1) 159:5	88:10 89:22 90:8,16
search (3) 137:22,23 160:16	93:1,4,9,13 103:5	setup (1) 28:18	signing (1) 162:20	91:1,22 92:6,16
searched (1) 45:19	129:12 134:5,8	seven (1) 68:11	Silberberg (3) 3:3 6:11,21	93:23 94:6,13,21
searches (2) 138:2,11	send (12) 46:16 47:1,22 49:12	sex (7) 24:19,22,25 25:2,14	similar (9) 11:12,23 21:15 25:11	95:20 96:6 97:17,21
searching (1) 136:12	53:2,12 55:1,19	69:24 70:2	26:1 37:2 125:22,23	98:1,11,16,19,21
Sebert (73) 1:8 3:13 6:9 7:2,4	114:14 160:11,21	sexual (11) 24:11,17 25:10,19	139:16	99:7,13 101:15
15:1,3,6,16 16:3,8	162:18	37:23 38:5,11,13	simultaneously (2) 75:15 88:3	102:6 103:2,4 104:9
17:3,14 24:22 25:15	sensibilities (1) 73:21	81:13 89:20 91:3	sing (5) 77:9,15,16,17,20	104:19 105:3
25:18 29:10 30:24	sent (42) 41:22 42:2,4 43:14,19	sexually (1) 46:16	singer (1) 134:11	106:24 107:23
31:18 34:10,15,17	44:1,6,9,12 45:23	shaking (1) 66:14	singers (2) 11:16 27:2	108:5 110:8,15,22
34:25 35:4,12 36:3	46:3,7,24 47:20	shave (1) 147:14	single (2) 79:7 147:19	111:5 112:2,8 114:6
37:24 38:16 43:19	48:3,9,21 49:16,22	shaved (2) 148:17,21	sir (5) 41:7,13 44:4,9 45:4	117:17,19 119:1
44:6,12 46:4,15	50:5,10,13,21,23	she'd (1) 148:2	sisters (2) 139:9,10	121:1,20 122:1,14
47:12 48:4 49:5,17	51:4,14 52:9,15	shirt (2) 148:4,7	sitting (2) 59:10 98:9	122:18,21,25 123:3
50:5,24 51:16 52:5	53:25 54:7,10,17	shit (1) 46:3	situation (4) 82:18 92:8 93:5,7	123:14,25 128:23
53:1,12 54:17 55:19	56:3,9,15,22 57:19	shock (1) 144:14	six (8) 13:8,22,23 14:5 18:3	129:24 131:5
56:10,22 57:19	57:22 58:10 114:13	shoes (1) 32:15	27:15,22 97:20	132:10 134:22
58:10,13 60:8 62:1	149:20 160:8	shoot (2) 23:22 31:6	skins (2) 58:1,4	136:14 139:4,20
62:2,5 67:17 71:8	separate (1) 130:14	shooting (1) 78:15	skipped (1) 65:15	142:7,15 144:10
71:11,13,16,23 72:4	series (1) 88:21	SHORTHAND (2) 171:3,8	skipping (1) 65:14	145:1 151:14,21
72:7 74:8,8 79:19	session (20) 15:19,20,22,25 16:2,7	shot (1) 134:11	slamming (1) 66:14	152:2,7 153:22,25
79:23 80:11 84:2,5	16:21,25 20:2,5	show (4) 60:9 68:16 78:16 91:4	slang (2) 48:12 58:4	154:4,12,15 155:12
85:9,14 163:14	22:6 46:13 47:7	showed (1) 68:20	Slash (1) 76:24	155:15,17,20
164:1	61:11 66:18 76:12	showing (3) 51:7 52:18 53:8	slept (1) 60:7	158:10 159:4,11,16
Sebert's (5) 16:20 25:2 30:16	105:7,11,15 114:2	shown (3) 106:17,22 107:5	small (2) 18:19 22:10	160:23 161:1,20
60:23 62:9	sessions (53) 11:8,9 17:17,19,22	shows (1) 36:1	smell (1) 34:23	162:7 166:5,19
second (2) 113:10,14	18:1,5,13,21 19:6	shrug (1) 8:24	smiled (1) 156:13	167:15,20 168:5,12
seconds (1) 34:14	20:23,24 21:6,13,19	shrugs (1) 8:23	smiley (5)	168:21
security (2) 27:5 48:25	21:23 23:3,8 24:4			snacks (1) 68:20
see (24) 16:7 17:23 30:24 32:4	24:13 25:4 27:3,24			snickering (1) 81:4
41:7,11,12 42:20	28:8,11 29:6,11,13			snowing (2) 148:4,7
59:13,13 60:10,15	29:21,23 30:12,25			social (1) 138:3
72:22 73:3 74:25	31:23 37:22 38:8			solidarity (1) 62:21
87:23 88:13 96:14	63:4,17 64:17,22			solo (1) 76:25
97:8 118:14,20	65:5 67:24 68:9,13			son (2) 64:3,3
137:13 160:1	69:11,16,20 71:4,9			song (25) 20:11 31:7 55:10
168:24	71:17,21,22 104:7			57:10 65:17,18,20
seeing (2) 25:25 48:15	104:15			66:6,10 76:10,11,19
seek (1) 168:19	set (9) 11:8 28:21,22 46:11			76:20 78:1,5,7,11
	50:13,17 55:11			78:15,18,22,25 79:5

15:19 36:13 songwriters (2) 27:1 38:2 Sony (6) 4:4 7:6 161:4,6,12 Sony's (1) 161:5 soon (1) 51:3 sorry (6) 28:3 107:25 111:25 117:20 131:13 141:13 sort (23) 29:4 30:22 34:19 36:20 42:18 45:5 47:2 51:23 52:1 61:9 62:21 63:20 68:23 69:21 76:14 91:3 103:1 109:15 116:3 138:2 148:20 156:13 161:5 sorts (4) 125:22 131:10 134:19 150:8 sound (6) 57:4,13 73:20,22 74:9 76:9 sounds (3) 60:6 73:25 129:20 sources (1) 98:4 South (1) 4:6 space (3) 79:24 80:12 147:10 spam (1) 162:20 Spanish (1) 44:15 sparkley (1) 55:18 sparkly (1) 55:24 speak (7) 18:12 22:13 101:17 109:21 142:12 143:9,12 speaking (5) 22:5 74:5 75:15,20 88:3 speaks (1) 165:22 specialist (1) 6:15 specific (5) 116:6,8 126:5 135:4 151:9	specifically (5) 104:10 112:1 125:11 135:6 144:7 speculate (1) 12:25 speculating (4) 95:13 118:2 131:25 146:19 speech (1) 138:19 spell (1) 7:23 spent (2) 83:18 130:8 spirits (2) 60:25 61:1 spoke (9) 18:15 22:8 62:16 65:24 109:17 113:4 127:21 128:5,17 spoken (3) 101:20 107:8 126:14 sporadic (1) 61:6 squeeze (2) 38:24 39:3 squirm (1) 35:21 staff (2) 32:14 47:4 stage (1) 59:24 stairs (1) 66:12 stairwell (1) 34:4 stand (1) 9:11 stands (1) 24:24 star (2) 30:22 76:23 star/rock (1) 30:21 Starbucks (1) 22:19 stars (1) 60:5 start (10) 10:18 29:5 74:17 84:13 104:17 105:14 110:1 111:25 143:19 159:19 started (5) 10:6 11:19 61:19 73:14 147:4 starting (1)	29:1 state (7) 6:18 7:20 43:25 88:5 133:2 170:6 171:9 stated (3) 13:21 109:17 145:11 statement (3) 94:13 130:9 144:20 statements (2) 103:23 144:16 states (2) 1:1 42:6 station (1) 79:1 stations (1) 78:15 stay (6) 21:20 68:1 84:14 155:22 163:14 164:24 stayed (2) 66:11,16 staying (1) 33:5 STENOGRAPHIC... 171:15 step (1) 19:25 steps (1) 34:5 stop (8) 22:17 74:23 134:16 137:17,18,19 155:20 168:20 store (1) 16:25 stormed (1) 66:12 story (1) 50:20 straight (1) 76:19 straight-forward (1) 97:19 straying (1) 81:20 Street (2) 3:5,14 strike (4) 12:23 21:5 111:25 157:25 string (2) 157:17,22 strip (3) 32:23 69:2 149:14 strong (2) 45:18 130:11 struggling (3)	62:19 146:7,8 stuck (1) 63:2 studio (38) 11:10 16:15 19:12 22:23 23:16 28:7 30:12,13,14,15 31:5 31:16 32:14,19 38:3 58:19 63:12,13 65:12 68:7 69:7 70:13,23 86:11,22 87:13 89:12,18 90:6 90:14,25 91:15 92:5 92:11 93:1,9,14 149:4 studios (16) 11:2,4 12:12,17,19 15:11,13,17 17:9 20:21 30:11 39:17 39:19 40:5 61:9 73:15 stuff (4) 26:1 140:2,3,21 subject (16) 36:4,7,9 58:14 61:13 65:10 79:24 80:1 82:6,9 109:22 112:13 115:3 168:2 168:3,10 subpoena (6) 102:14,17,19,21 103:7 160:21 SUBSCRIBED (1) 171:21 subsequent (1) 78:11 success (1) 21:16 succession (2) 54:12 116:12 Suite (1) 6:12 suits (2) 132:7,19 summer (1) 18:24 supportive (1) 62:12 supposed (3) 28:5 100:19 164:12 sure (26) 9:13 15:23 27:3,5 29:20 69:25 81:8 84:21 87:18 88:12 88:21 101:4 118:3 122:22,24,24 126:1 127:19 129:21 146:13 151:24,25	152:6 154:14 157:2 168:24 surprised (1) 133:12 surprising (1) 111:1 Susan (2) 3:17 7:3 Sushi (2) 42:13 46:10 swear (1) 7:9 swing (1) 74:22 sworn (1) 7:13 symbol (1) 135:13 system (1) 64:7 <hr/> T <hr/> T (1) 5:6 table (2) 46:11 59:11 take (18) 9:5 29:25 30:22 32:17 37:12 58:5 63:22 75:5 79:8 84:12 109:2,24 112:24 113:18 124:7 154:13 165:6,8 taken (7) 34:12 37:15 79:12 103:16 164:5,7 171:10 talk (30) 18:18 19:13 22:10,22 32:8,19 36:15,15,18 38:11 61:23,24 73:18 81:19 88:16 107:16 108:24 112:12,15 114:16 115:3 125:10 133:17 140:9 143:22 146:3 148:22 154:13,15 168:3 talked (20) 24:21,22 36:20 51:18 81:12 93:12 123:16 124:14 126:6,10 129:8,12 142:1 143:24 144:4 146:4 153:1,3 160:12 168:10 talking (14)
---	---	--	---	---

24:19 25:12,14 38:15 59:19 69:23 100:19 113:13 130:22 132:6,17 133:8 137:14 153:13 tantrum (1) 80:21 team (4) 24:1 74:14 93:3,4 tech (1) 57:8 technical (4) 9:19 10:1,3 116:15 technicians (1) 121:23 technology (1) 119:11 telephone (6) 105:21,22 118:24 119:8 167:19,22 tell (13) 14:11 62:5 74:17 77:19 100:20 107:17,21 110:24 114:4,21,24 148:20 166:10 telling (9) 38:24 52:5 97:3 106:13 115:2 150:25 152:23 153:16 164:8 Tennessee (4) 1:2 3:15 68:8 161:7 term (3) 48:12 58:4 93:7 terminate (1) 165:5 terms (2) 85:13 161:18 test (1) 51:22 testified (9) 7:14 20:2 63:3 86:17 116:15 132:6,18 153:12 160:10 testify (2) 99:25 155:17 testimony (18) 86:25 90:13,18,22 92:17 106:8,18 124:16,18 129:25 135:23 142:8 152:13 165:18 167:5 170:6 171:13 171:17 text (44) 5:8 42:17 45:5 46:13	46:14 115:15,19,24 117:6,25 118:9,21 119:16 120:24 121:15 122:3,7 123:6,11,20 124:14 124:20 125:4,14,19 125:23,24 144:2 153:12,14,16 154:10 155:7 156:10,18 157:5,7 157:16,16,19,21,21 158:2 163:1 texting (3) 49:3,5 115:25 texts (1) 122:6 thank (24) 9:15 22:11 35:7 46:20 47:9 48:14 51:9 53:7 84:11 85:8 87:10,12,17,20 108:23 112:9 121:12 123:3 124:13 128:11 135:24 152:7 162:7 168:23 thanking (1) 51:7 Thanks (4) 46:21 47:14 51:2 114:16 theoretical (1) 99:23 they'd (2) 19:12 32:17 thing (7) 22:13 24:18 48:17 56:8 70:4 76:14 160:21 things (13) 31:22 33:15 80:16 89:3 92:23 111:9 116:16 129:16 134:17,19 150:8 152:1 164:4 think (69) 8:5 10:6 12:25 21:10 21:16 22:19 23:25 31:8 32:10 34:7,22 35:19,21 38:22 49:10,21 54:11 55:23 56:18 57:16 57:17 59:15 61:19 66:16 67:21 68:3,15 68:19 69:15 70:15 70:25 71:1 73:13,24 74:4,11,12 76:8,16 76:19 77:3,4,5,14	79:6 88:4,6 96:15 97:24 101:19 104:23 105:1 110:12 111:2 114:13 117:10 128:4 131:15 133:12 134:17 139:22 141:20 148:16,19 153:10 154:3 155:21,22 160:18 third (3) 7:6 39:13 94:19 third-party (1) 161:1 thought (18) 19:3 45:20 47:8,18,24 48:1,3 50:14 52:25 60:1 62:22 79:7 80:8 82:10 101:8 129:6 146:20 147:12 thoughts (1) 146:22 threats (16) 24:7 25:7 129:8,13 133:18 135:1,18 136:5,6,25 137:4,14 137:14 143:24 144:3,25 three (16) 9:21 18:2 21:10,11 39:9,18 43:24 56:9 104:15 116:13,14 130:14 135:17 139:10 143:14,17 throwing (1) 80:21 Tick (1) 21:16 tied (1) 135:7 time (159) 6:5 9:5,13 10:20 11:3 12:10,13,16,19,22 13:3,6,9,10,15 14:7 14:17 15:5,7,13,17 16:14,15 17:1,2,11 17:15 18:23 19:1,19 21:10,21 22:12 23:10,12,17,18 25:2 25:11 26:8,25 27:12 29:1,2,12 30:10 33:10 35:18,25 38:3 38:7 43:6,21 47:2 48:21 51:8,19 58:21 59:1,2 61:1 62:13 62:21 64:1,5 65:22	66:3 68:22 69:23 70:10 72:3 75:20 77:6 79:4,16 80:2 83:18 85:17,21,22 85:24 86:3,9,16,18 90:2,21 91:24 94:24 104:5,5 109:6,7,25 109:25 111:18 113:2,4 116:18,18 118:1 120:21 122:9 122:11,20 125:16 127:4 128:5,16 130:8 132:5,16 134:14,19,23,25 135:25 141:8,14,16 142:3 145:4 146:9 146:14,22,25 147:1 147:11,20 148:5,12 148:23 149:12 150:24 151:4,5,7,12 151:25 152:16,23 153:5,15,15 154:9 155:6 157:9 159:20 161:8 163:9 164:23 166:3,10 167:25 168:20 171:11,12 171:14,18 timeline (4) 136:12,16,20,25 times (25) 18:25 21:19 32:21 36:11,14 61:11 62:24 72:8 73:5 80:21 92:19 104:3 108:24 109:21 126:13 128:13 143:9,12,14 145:19 146:11,12 147:6 148:16 165:25 title (5) 9:20,23,25 10:16 143:5 Tock (1) 21:17 today (33) 6:16 9:6 42:1 70:2 72:10,12 93:12,18 93:22 95:7 98:9,23 102:5,6,15 104:1 106:15,18,22 107:7 107:17 115:7 134:6 134:9 151:18 152:1 152:18 160:14 164:1 165:17 166:9 168:22 169:2 told (14) 29:5 32:16 35:19 66:5 81:25 107:18 108:1	109:4 110:20 147:12 152:16 153:8 163:13,16 tonight (2) 107:19 149:22 top (8) 41:5 42:6,23,23 82:20 102:22 118:13 148:8 topic (3) 110:2 111:20 149:11 topics (1) 112:19 totally (1) 93:5 tough (1) 75:3 tour (5) 59:21,25 61:21 68:21 68:24 trainer (1) 62:18 TRANSCRIBED (1) 171:16 transcript (2) 88:15 162:4 transcription (2) 170:5 172:6 transpired (2) 138:13 144:24 trash (5) 33:21 34:7,8 35:2,5 Travel (2) 46:22 47:9 treated (5) 37:4,5 82:6 87:3,6 treats (1) 84:1 tree (1) 93:10 tried (2) 60:8 91:4 trip (1) 35:24 truck (1) 51:19 true (8) 60:1 119:24 140:4,6 140:22 141:18 142:6 171:17 truthful (1) 138:20 truthfully (1) 92:24 truthfulness (1) 104:25 try (3) 57:16 68:21 101:17
--	---	---	---	--

62:20,25 77:6 101:3 126:4 148:16 163:23 TSG (2) 6:15,17 Tuesday (10) 104:5 105:7,23 106:1 106:2,3,5 113:11,15 114:2 tune (2) 57:3,12 tuned (1) 57:10 turf (1) 68:15 turn (5) 34:5 42:22 43:2 157:13,19 turning (1) 42:20 TV (1) 31:15 tweeted (1) 138:21 tweeting (1) 136:21 tweets (5) 134:5 136:13,23 137:25 139:1 twice (4) 73:1 109:1,23 126:15 Twitter (27) 96:14 97:8,10,16 129:8,13 133:16,17 133:19,20 134:2,12 134:18 135:9,10,12 135:16,19 136:5,10 136:17 137:22,23 138:10,11,23 140:2 two (27) 28:17,17 39:11 41:12 46:2 49:19 52:15 53:20 54:15 55:19 62:15 73:5 80:10 94:14 105:5,9 124:7 124:23 143:14 149:5 153:5 156:20 162:10,13,21 164:5 164:14 two-hour (1) 105:15 type (2) 30:23 65:15 typed (1) 120:10 <hr/> U <hr/> u (1)	47:14 Uber (1) 125:24 Uh-huh (1) 143:21 Um (3) 34:24 35:17 56:18 uncomfortable (18) 19:18 20:6 23:12 35:17 36:2,2 45:3,8 60:10 69:22 71:6,14 71:24 89:10 146:12 146:23 148:1,17 UNDERSIGNED (1) 171:8 understand (18) 82:19 85:11 86:13 89:13 91:14 94:23 95:5,9 99:21 113:17 126:2,3 136:11,16 138:13 145:14 156:7 157:2 understanding (15) 10:13 29:3 42:9 44:17 48:20 53:14,17 54:19 74:7 82:22 96:18 99:10 118:25 119:5 120:17 understood (6) 8:25 66:4 108:4 127:24 136:24 139:25 unfair (1) 82:11 unfounded (1) 130:7 Union (1) 3:14 unique (3) 89:9,10 90:11 UNITED (1) 1:1 unprofessional (2) 110:18 164:4 upset (3) 89:11 93:10 148:21 upside (1) 117:20 upstairs (4) 34:1 58:20 66:5 80:3 urinate (5) 33:19 34:10,15 35:1,5 urinated (2) 33:22 34:18 urinating (1) 33:18 urination (1) 36:10	urine (2) 36:4 37:10 use (8) 56:6 87:17 158:7,8,17 158:20,23 162:12 usually (3) 31:23 38:8 61:1 <hr/> V <hr/> vacation (1) 69:9 vague (3) 64:19 116:24 151:15 vast (1) 160:2 verbal (2) 83:7,11 versus (1) 108:2 vibe (3) 50:9 63:19,21 vibes (1) 68:25 video (10) 6:15,24 31:6,8 81:7,8 105:21 106:11 167:19,22 Videographer (18) 4:11 6:4 7:8 37:13,17 79:9,14 103:14,18 124:8,11 154:18,22 155:25 156:4 165:9 165:12 168:25 Videotaped (2) 1:16 2:8 violently (2) 67:8,10 vision (4) 73:8,12 74:15 75:24 visited (1) 49:7 visually (1) 74:4 vocal (9) 32:4 33:18,19,20 34:9 34:11,13,18 70:15 vocals (2) 58:22 77:21 Volume (4) 1:15 2:9 5:3 6:7 vs (2) 1:7 6:9 <hr/> W <hr/> wait (4) 8:19 122:14 153:23 168:4 walk (3)	9:11 77:17 152:9 wall (1) 34:21 want (31) 32:2,16 47:5,5 59:13 59:13 60:10,13,15 66:6,10 73:20 74:5 75:16,19 77:16 78:17 79:5 84:13 88:5 103:12 122:22 129:20 134:16,17 138:17 148:13 151:1,24 160:20 161:18 wanted (12) 32:3 34:7 47:24 51:9 66:1 68:2,16 73:19 74:9 76:1,21 84:18 wanting (2) 60:2 61:24 wants (1) 163:10 Warrior (43) 26:3,6,8,12,15,24,25 27:14,15,17,21,25 28:8,15 29:7,11,24 31:17 32:21 38:21 52:3 60:22,25 61:11 61:14,20 63:4,18 64:17,23 65:6 67:24 70:6 71:5,9,18 72:21 73:7 75:24,25 78:9 145:18 148:6 wasn't (9) 16:13 34:24 36:20 59:9 61:1 66:3 72:12 91:8 155:19 watches (1) 96:15 way (20) 31:4,15 36:15 37:3 38:17 47:8,10 57:11 57:13 80:17 87:20 88:25 89:9,11,17 92:22 130:13 144:23 145:5 149:20 ways (2) 97:20 129:14 we'll (2) 125:10 168:24 we're (21) 6:5 37:17 66:6 75:20 79:14 84:17 92:8 104:23 112:25 113:16 118:19 126:4 131:15 132:6 132:16 133:8 156:4	159:18 164:22 165:7,12 wear (1) 148:2 Wednesday (3) 1:18 2:4 114:12 week (16) 13:8,22,23 14:5 18:3 27:16,22 29:16,17 62:14 109:13,14,15 109:25 110:1 156:20 weeks (4) 18:2 21:10 62:15 143:17 weight (10) 61:13,21,25 62:3,6,9 62:20 136:1 146:3,9 weird (1) 80:9 went (26) 18:1 22:15 30:10 32:23 33:1,13,14 38:10 52:2 59:24,25 66:4 67:17 68:1,4 69:2,2 70:7 78:16 80:7 140:3 146:6 148:18 149:15 167:10,10 Werd (3) 48:7,14 52:8 weren't (1) 29:20 West (3) 2:9 6:11 39:12 whatsoever (1) 141:5 WHEREOF (1) 171:21 whiskey (1) 69:16 White (4) 1:22 2:11 6:16 171:25 whoop (4) 58:2,2,6,7 wiener (4) 42:17 43:3,7 157:20 wife (1) 107:21 willing (3) 100:15 161:25 164:21 window (1) 33:7 wish (3) 72:12,12 88:14 wishes (1) 164:1 witness (104)
--	--	---	--	---

4:5 5:2,13 7:7,9,12 19:4 23:1 24:5,7 26:14,21 40:13 75:3 75:7,17 84:14 88:2 88:17 90:10 91:2,24 92:7 94:3,7,24 95:13,17,21,25 96:1 96:7,11,22 100:12 100:14 102:7,12 103:3,7 104:8,11 105:4,5 107:11 110:6,19 111:6,13 111:17 112:4,9 114:9 115:11 119:10,13 120:5 121:17 122:2 123:18 127:21 128:25 129:1,2 130:2 131:6 134:23 135:25 137:2,7,12 137:18,19 139:2,5 139:21,25 141:24 142:9 145:2,24 147:1 152:3 153:18 154:3,17 155:10,14 155:16,18 159:5,17 164:6 165:24 166:8 166:17 167:16 168:7,12,16 171:12 171:13,21 172:3 witnessed (2) 26:18 77:11 Woke (1) 134:5 Wonderland (3) 54:25 55:11 57:10 wood (5) 49:20 50:8,14 57:2,6 woods (3) 50:9,15,16 word (3) 44:18 49:16 74:13 wording (1) 88:18 words (1) 8:21 work (34) 13:2,17,19 14:1,3,8 21:18 27:8,10,18,20 28:19,25 30:11 35:24 47:7 51:9 61:10 66:5 68:2,4 70:7,14 71:2 94:1 104:21 112:5,10 120:2 158:24 160:11 162:12,19 162:22 worked (23)	10:12 11:1 14:12,13 14:18,21 18:17,23 60:21 62:17 65:16 68:4 69:3 90:11,23 91:5 92:25 125:3 139:12 145:18 150:19,23 151:2 working (50) 12:12 13:11 14:17 15:14 16:11,14 17:12,16 19:1 22:10 22:23 29:5 31:25 36:11,23 38:2,20,21 42:15 45:6 47:3 57:9 58:18,20 60:12 61:3,19,22 62:12 63:16 64:12,14 65:11 66:7 69:7,10 70:9,23 73:14 80:2 85:15,24 89:12,16 93:8 112:25 124:16 147:18 148:13 162:19 workplace (1) 129:10 works (4) 50:8 93:8 98:14 143:3 world (2) 30:23 129:15 wouldn't (4) 27:6 32:20 61:8 87:4 Wright (3) 18:10 20:4 22:3 write (1) 78:18 written (2) 74:21 84:16 wrote (4) 69:5 78:25,25 120:8 <hr/> X <hr/> X (2) 5:1,6 Xx (1) 58:9 <hr/> Y <hr/> ya (4) 48:7,15 50:9 51:3 Yay (1) 58:1 ye (1) 56:14 Yea (1) 53:22 yeah (54) 19:14 21:11,18 24:24 24:24,25 25:13	28:19 31:14 34:8,24 35:24 36:24 37:10 40:8 45:2,7 49:3 51:18 52:1 56:7,7 56:21 63:2 68:14 69:3 70:17 73:18 74:10 79:6 85:19 86:17 88:4 92:22 106:20 109:7 119:5 120:11 121:23 122:16 127:10 129:4 131:15 133:3 134:25 135:5 149:2 149:7,21 152:6 154:14 165:24 166:22 168:5 year (1) 116:6 years (3) 9:21 53:23 135:17 yell (8) 67:12,14 77:24,25 80:23,23,25 83:15 yelled (1) 83:13 yelling (5) 24:5,14 25:5 80:24 81:2 Yep (1) 48:2 yes-or-no (1) 168:6 yesterday (1) 109:25 York (7) 3:6,6 132:1,8,20 161:6,13 young (3) 78:2,21 139:11 yous (4) 22:11 87:11,13,17 <hr/> Z <hr/> 0 <hr/> 1 <hr/> 1 (23) 1:7 5:8 6:7 40:15,16 40:21 42:6 43:3 44:11 58:12 79:10 79:11 107:2,5 117:6 117:11 153:11 154:10 155:8 157:10,12 163:2 172:5 1:19 (3) 37:14,16 167:3	1:47 (3) 37:16,18 167:4 10 (6) 13:12,23 14:5 27:16 27:22 34:4 100 (1) 151:25 10017 (1) 3:6 102/5 (1) 5:15 108779 (1) 1:23 11377 (2) 2:9 6:11 12 (4) 3:5 13:12,24 14:6 12:00 (1) 167:2 12:30 (1) 164:9 12:34 (3) 2:5 6:2,6 14 (5) 13:12,24 14:6 27:16 27:22 15 (4) 1:18 2:4 6:1 169:3 159/8 (1) 5:15 15th (1) 6:5 162/18 (1) 5:20 168/9 (1) 5:16 16th (1) 126:17 172 (1) 1:7 1st (2) 48:18,22 <hr/> 2 <hr/> 2 (3) 42:24 79:15 172:5 2:42 (2) 79:10,13 2:50 (1) 48:18 20 (1) 34:4 2008 (3) 11:5 12:11 15:9 2009 (2) 17:7 21:3 2009-ish (1) 23:21	2010 (2) 11:5 21:3 2011 (2) 10:5,23 2012 (22) 10:6,23 28:3,4,6,9,12 28:15,22 29:9,20 39:6 42:7,11 48:18 48:22 72:25 79:21 117:14,22 118:1,7 2012-ish (1) 8:6 2013 (2) 72:25 126:21 2015 (11) 131:11 132:6,17 141:7,7,16,21,21,25 141:25 142:4 2016 (14) 1:18 2:4 6:1,5 135:2 140:1 141:11,17 142:4,10,14 143:17 169:3 171:22 22nd (1) 117:14 27 (3) 42:7,11 171:22 27th (3) 117:19,20,22 <hr/> 3 <hr/> 3 (1) 172:6 3:14-cv-2039 (1) 1:7 30 (2) 34:14 105:13 333 (1) 4:6 37219 (1) 3:15 <hr/> 4 <hr/> 4:02 (2) 79:13,16 4:27 (2) 103:15,17 4:30 (2) 84:13 103:11 4:51 (2) 103:17,19 40 (1) 5:8 4148 (3) 1:23 2:11 171:25 49th (1) 3:5
--	---	---	---	--

<hr/> 5 <hr/> 5:10 (1) 124:9 5:11 (1) 124:12 5:44 (2) 154:19,21 5:53 (2) 154:21,23 5:54 (4) 156:1,3,3,5 511 (1) 3:14 <hr/> 6 <hr/> 6:00 (6) 163:6,14,19 164:11 164:16,25 6:03 (1) 165:10 6:13 (1) 165:13 6:16 (2) 169:1,5 600 (2) 6:12 144:3 <hr/> 7 <hr/> 7 (1) 5:3 7:30 (1) 113:24 70s (1) 60:4 <hr/> 8 <hr/> 85 (1) 5:3 <hr/> 9 <hr/> 9 (1) 40:21 9:57 (2) 42:7,10 90064 (1) 6:13 90071 (1) 4:7 93/200 (1) 5:14 95/19 (1) 5:14				
---	--	--	--	--