

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

-oOo-

TERRI MULLINS and WILLIAM
MULLINS, CIVIL ACTION NO.: 1:06cv457LTS RHW

Plaintiffs,

-vs-

STATE FARM FIRE AND CASUALTY
COMPANY, et al.,

Defendants.

Pages 1 to 248

VIDEOTAPED DEPOSITION OF NELLIE M. WILLIAMS

Thursday, December 14, 2006

Reno, Nevada

Reported by: DENISE PHIPPS
Nevada CCR No. 234, RDR, CRR
California CSR #6804

Page 2

APPEARANCES:

FOR PLAINTIFF:
 BARRETT LAW OFFICE
 BY: DEREK A. WYATT
 404 Court Square North
 P.O. Box 987
 Lexington, Mississippi 39095
 -and-
 HESSE & BUTTERWORTH
 BY: GARY YARBOROUGH
 8441 Highway 90
 Bay St. Louis, Mississippi 39520
 -and-
 DAVID NUTT & ASSOCIATES
 BY: MARY E. McALISTER
 605 Crescent Blvd, Suite 200
 Ridgeland, Mississippi 39157

FOR DEFENDANT STATE FARM:
 ALLEN, COBB, HOOD & ATKINSON
 BY: SHERRIE L. MOORE
 2512 25th Avenue
 Gulfport, Mississippi 39501

FOR DEFENDANT FORENSIC:
 GALLOWAY, JOHNSON, TOMPKINS, BURR & SMITH
 BY: LARRY G. CANADA
 701 Poydras Street, Suite 4040
 New Orleans, Louisiana 70139-4003

-oOo-

1782521e-7f62-4828-a7bb-1471160077ad

Page 4

BE IT REMEMBERED that on Thursday, December 14, 2006,
 commencing at 9:00 a.m. of said day, at The Courtyard by
 Marriott, Tahoe Board Room, 6855 South Virginia Street, Reno,
 Nevada, before me, DENISE PHIPPS, a Certified Court Reporter,
 personally appeared Nellie M. Williams.

-oOo-

(Exhibits Forensic 21 and 22 marked.)

THE VIDEOGRAPHER: We're now on the record at
 9:00 a.m. The date is 14 December 2006.

This is Volume 1, Part 1, of the deposition of
 Nellie M. Williams. The caption of the case is Mullins
 versus State Farm, et al., Civil Action No. 1:06cv457 LTS
 RHW. This deposition is being taken on behalf of the
 plaintiffs.

Will all attorneys present please identify
 themselves and state the parties they represent.

MR. WYATT: I'm Derek Wyatt, and I represent
 William and Terri Mullins, the plaintiffs.

MR. YARBOROUGH: Gary Yarbrough for the
 plaintiffs.

MS. McALISTER: Meg McAlister for the
 plaintiffs.

MS. MOORE: Sherrie Moore for State Farm Fire &
 Casualty Company.

1782521e-7f62-4828-a7bb-1471160077ad

Page 3

INDEX OF EXAMINATIONS

	EXAMINATIONS	PAGE
3	By Mr. Wyatt	5

INDEX OF EXHIBITS

NO.	DESCRIPTION	PAGE
21.	Subpoena	4
22.	Notice of Taking Deposition	4
23.	Cat Team Onsite Report Procedures	127
24.	Copy of Business Cards of Stephen Howard and Mark Thomas	129
25.	Subpoena to Testify Before Grand Jury Dated November 2, 2006	129

REFERENCED EXHIBITS

		PAGE	LINE
18	9.....	104	17
19	3.....	138	1
19	12.....	194	21

1782521e-7f62-4828-a7bb-1471160077ad

Page 5

MR. CANADA: Larry Canada for Forensic Analysis
 and Engineering Company.

THE VIDEOGRAPHER: We are located at Courtyard
 by Marriott, 6855 South Virginia, Reno, Nevada. My name is
 Val David Smithson, the videographer. I represent Bill
 Stephens Productions at 320 Stewart Street, Reno, Nevada.
 The court reporter is Denise Phipps from Captions Unlimited
 of Nevada, P.O. Box 20905, Reno, Nevada.

She will now administer the oath to the
 deponent.

NELLIE M. WILLIAMS

Having been first duly sworn, testified as follows:

THE VIDEOGRAPHER: Please proceed.

EXAMINATION

BY MR. WYATT:

Q Good morning, Ms. Williams.

A Good morning.

Q My name is Derek Wyatt. I introduced myself to
 you earlier. I'm going to be asking you some questions today
 in this deposition, and we are the parties that noticed the
 deposition. After I have completed my questions, some of the
 other attorneys on the other side of the table, Mr. Canada or

1782521e-7f62-4828-a7bb-1471160077ad

Page 6

1 Ms. Moore, may ask you some questions as well.

2 A Okay.

3 Q Have you ever given a deposition before?

4 A No, I haven't.

5 Q We usually offer witnesses sort of an idea of

6 the rules of the road, and they're pretty simple.

7 But the main thing you want to do is try to say

8 yes and no instead of uh-huh or hu-huh, because, as you can

9 see, this is being transcribed, and the record reads clearer

10 if it says yes or no as opposed an uh-huh- or hu-huh-type

11 answer.

12 So if you'll try to do that, we'll appreciate

13 it, and I'll try to help you remember that as we go along.

14 A Not a problem.

15 Q Also, in the same thing, in the same vein, you

16 don't want to nod your head even though this is on video.

17 It's clearer in the transcript if the transcript doesn't say

18 witness nodded but it says yes or no.

19 So same thing applies to head nodding. Try to

20 say verbal answer yes or no instead of just nodding.

21 A Okay.

22 Q Now, if at any time during the deposition I ask

23 you a question that you don't understand, please ask me to

24 repeat the question and I'll do that in a way that you do

25 understand it.

1762521e-0762-4828-870b-1471160077ed

Page 8

1 Q Okay. Good. Have you ever given a deposition

2 before?

3 A No, I have not.

4 Q All right. I'm going to start by asking you

5 some questions that have to do with your background. None of

6 that is intended to embarrass you, but it's so that the

7 ladies and gentlemen of the jury can understand who you are

8 and how you fit into this case.

9 See what I mean there?

10 A Yes.

11 Q So nothing we're asking here today is intended

12 to probe unduly into your background, simply to give the

13 ladies and gentlemen of the jury and the court and us a

14 chance to understand who Nellie Williams is and how she fits

15 into Forensic Engineering and so forth.

16 A Yes.

17 MR. WYATT: Okay. A couple of stipulations I'll

18 state for the record: First, that this deposition is being

19 taken pursuant to notice, which has been premarked as Exhibit

20 Forensic 22, and also pursuant to a subpoena, which has been

21 premarked as Forensic 21 and appended to the record.

22 The deposition will be taken pursuant to the

23 usual stipulations that all objections are reserved until

24 such time as the deposition is sought to be introduced except

25 as to the form of the question, and that objections must be

1762521e-0762-4828-870b-1471160077ed

Page 7

1 But if you answer the question, I will then take

2 it that you understood it.

3 Do we have that agreement?

4 A Yes, we do.

5 Q Okay. If you need to take a break during this

6 deposition for purposes of stretching your legs or using the

7 restroom, getting water, whatever you need, just let me know,

8 we'll be happy to oblige you on that.

9 Depositions are testimony that is being taken

10 just like you're in a courtroom, but we're not in a

11 courtroom.

12 So it's not appropriate to take a break for

13 purposes of formulating an answer to a question. But it is

14 appropriate to take a break for personal reasons. Is that

15 okay?

16 A Yes, I understand.

17 Q You understand that. And will you abide by that

18 today?

19 A Yes, I will.

20 Q All right. Are you under any kind of impairment

21 that would prevent you from testifying truthfully here today?

22 A No, I'm not.

23 Q You're not on a medication or anything of that

24 nature?

25 A Not that would interfere with this.

1762521e-0762-4828-870b-1471160077ed

Page 9

1 stated concisely and in a nonargumentative and nonsuggestive

2 way.

3 Q Go ahead, Ms. Williams, please, and state your

4 full name and your present address, residential address, for

5 the record.

6 A My name is Nellie Maria Williams, and I

7 currently reside at 250 Mugo Pine Circle in Reno, Nevada.

8 The zip is 89511.

9 Q Do you have a business address?

10 A No, I work at home.

11 Q Okay. I'm going to hand you a copy of what's

12 been marked as Forensic 21. That is the subpoena that I just

13 alluded to in the record.

14 Would you please take a look at that and tell me

15 whether or not you were served with that subpoena.

16 A Yes, the top page I recognize. I don't have

17 this page.

18 Q Okay. Did a process server come and hand you a

19 subpoena?

20 A Yes.

21 Q Was it that subpoena that you're holding?

22 A This subpoena here, yes.

23 Q Okay. Thank you, ma'am.

24 That occurred at your address of 250 Mugo

25 Circle?

1762521e-0762-4828-870b-1471160077ed

Page 150

1 You billed them for that, right?

2 A Doesn't seem to be a double charge so no. This

3 was billed for the time that Jack Kelly spent and for the

4 report that he submitted. There was a standard charge for

5 that. If we had billed for both, there would have been a

6 double charge.

7 Q The amount of money that's billed on the case

8 file expense Document No. 35, Forensic 3, is 302.37, right?

9 A Uh-huh.

10 Q And the last date of any of that was

11 October 3rd, 2005?

12 A On that expense report, yes.

13 Q And on the invoice itself, which is marked Bates

14 No. 33, how much is the amount billed?

15 A 67.50.

16 Q How much is the total amount billed for that?

17 A 302.37.

18 Q Exactly what's on the other document, isn't it?

19 A Yes.

20 Q Okay your testimony is, though, that this

21 billing item does not relate to that document. It relates to

22 something else; is that right?

23 A Every bill that we billed for State Farm had a

24 charge for \$67.50, which was the cost factored in for Adam

25 binding, copying, printing the whole kit and caboodle, if you

1782521e-7f62-4826-87db-1471160977d4

Page 152

1 thing that Mr. Manon did?

2 A The location didn't change, so the mileage, yes,

3 would be the same. He reviewed the same photographs. The

4 per diem was exactly the same and the charge that we had on

5 the file for Adam was the same. If you would review all of

6 our invoices, you'll find that exactly the same.

7 Q Who did you talk to before you came here to

8 testify?

9 A My husband.

10 Q About this case?

11 A My husband.

12 Q Does your husband have knowledge of this case?

13 A Well, he does now, yeah, sure.

14 Q What does he know about it?

15 A He was with me while I was going through this

16 whole thing.

17 Q So you would tell him the blow-by-blow accounts

18 of what was happening?

19 A Not blow by blow. The highlights, probably.

20 Q Did he give you advice about what to say today?

21 A Oh, no.

22 Q Who else did you talk to before you came to

23 testify here?

24 A Steven Howard and Mark Thomas.

25 Q And anyone else?

1782521e-7f62-4826-87db-1471160977d4

Page 151

1 will, sorry, the reports.

2 If this, the report that we billed for on

3 January 3rd was the one that was finally authored by Jack

4 Kelly, so it was that report that we charged and got paid

5 for.

6 The expense report, if Wendy attached the wrong

7 one to it, I can't help that.

8 Q All the items on Document No. 35 are carried

9 over to this invoice on Document 33, right, not just the \$67?

10 All of this --

11 A If you notice what the charges are, it's the

12 travel, the mileage, the photographs and the per diem, that

13 would all be the same.

14 Q That's for Mr. Manon?

15 A That was for this case.

16 Q Mr. Manon did that, didn't he, Ms. Williams?

17 A He did do the first one.

18 Q That's what you're billing for, Mr. Manon, isn't

19 it?

20 A But we didn't charge twice because we didn't

21 turn in two bills.

22 Q So you're saying you put Mr. Manon's expenses

23 over here on this document, or you put Mr. Kelly's?

24 A They would be the same, is what I'm saying.

25 Q You're saying Mr. Kelly did exactly the same

1782521e-7f62-4826-87db-1471160977d4

Page 153

1 A No.

2 Q Are you represented by counsel?

3 A No.

4 Q So you've had no conversations with Mr. Canada

5 over here before you came here today to testify?

6 A No, not at all.

7 Q You had none with Mr. Kochan?

8 A No.

9 Q None with any of the other former or present

10 employees of Forensic, including Mr. Kelly and Mr. Forbes,

11 none of those people?

12 A No.

13 Q So you wouldn't have known anything that

14 Mr. Kochan testified to a few weeks ago, would you, because

15 nobody told you that?

16 A No.

17 Q And no one would have told you what Wendy

18 Nichols had said in a deposition a few weeks ago because you

19 just hadn't had any opportunity to talk to anybody to learn

20 that kind of thing?

21 A No.

22 Q So if what you're telling us today somehow

23 corresponds in some arcane way with something they said, it's

24 pure coincidence; is that right?

25 A Yes, absolutely.

1782521e-7f62-4826-87db-1471160977d4

Page 174

1 (Recess taken at 1:48 p.m.)

2 THE VIDEOGRAPHER: We're back on record at

3 2:06 p.m.

4 Please continue.

5 BY MR. WYATT:

6 Q Ms. Williams, you have already stated today that

7 you were personally served with the document marked as

8 Forensic 21, which is a subpoena being a court order out of a

9 Federal Court located in the District of the State of Nevada

10 commanding that you appear today, correct?

11 A Yes, that's correct.

12 Q And you have never authorized anyone to

13 challenge that subpoena, have you?

14 A No.

15 Q And to your knowledge, it has not been

16 challenged, has it?

17 A No.

18 Q And that subpoena, being a lawful order out of

19 the Federal Court in the United States District Court for the

20 District of Nevada, also commanded that you permit inspection

21 and production -- excuse me, that you produce and permit

22 inspection and copying of documents or objects, correct?

23 A Correct.

24 Q And you brought documents or objects to this

25 deposition today pursuant to this lawful order of the United

1762521e-1782-4828-47bb-14711d0077ad

Page 176

1 contempt of this order.

2 Which do you choose?

3 MR. CANADA: Now, hold on, counsel. Again,

4 without even going into the issue of whether these are FREC's

5 or not, there are electronic files that are on these disks

6 that may be responsive to the subpoena and there are a lot of

7 them that are not.

8 BY MR. WYATT:

9 Q Ms. Williams, who authorized you to give the

10 documents commanded by this court order to a person who's not

11 your attorney to review those documents before you came here

12 today?

13 A Nobody.

14 Q I'm asking you again, do you choose to be in

15 contempt of this subpoena or are you turning over the

16 documents commanded by the subpoena?

17 MR. CANADA: Are you saying, Counsel, that by

18 her not giving you documents that are not responsive to the

19 subpoena, that she would automatically be in contempt of

20 court? Is that what you're representing to this young lady

21 who is not represented, you, as a lawyer speaking to her?

22 BY MR. WYATT:

23 Q Did you give the documents that were ordered to

24 be produced to Mr. Canada who is not your attorney?

25 A Yes.

1762521e-1782-4828-47bb-14711d0077ad

Page 175

1 States District Court in the District of Nevada, did you not?

2 A Yes.

3 Q Where are those documents or objects?

4 A They're here on the table.

5 Q We're asking that you turn those over to us

6 pursuant to this order.

7 MR. CANADA: The problem, Counsel, as I stated

8 earlier, is that the disk contain documents that are not

9 responsive, that are outside of the subpoena.

10 Now, how do you extract only those that are

11 responsive and those that are not?

12 BY MR. WYATT:

13 Q Ms. Williams, I'm asking you again, you are not

14 represented by counsel. You have received a lawful order of

15 the United States District Court of the District of Nevada.

16 Are you refusing to turn over the documents that you were

17 commanded to bring here today?

18 A I believe perhaps I need to reread the subpoena

19 and perhaps filter only the documents that were appropriate

20 in the subpoena. I perhaps misunderstood the subpoena.

21 Q Ms. Williams, this is an order of the court.

22 A Yes. I fully intend on --

23 Q Okay. You have a choice. This is your choice.

24 You can either turn over the documents that you brought here

25 today pursuant to this order, or you can choose to be in

1762521e-1782-4828-47bb-14711d0077ad

Page 177

1 Q And Mr. Canada is holding the documents,

2 withholding the documents from us pursuant to this lawful

3 order, and you are ratifying what he's doing; is that

4 correct?

5 MR. CANADA: First off, again, Counsel, they are

6 not documents. They are CDs, writable CDs. There are one,

7 two, three, four, five that were CDs prepared in response

8 to -- prepared in anticipation of litigation, in fact, and

9 while litigation was pending for and on behalf of FASC.

10 And they contain in them -- although I have not

11 actually looked at them with your technical savvy, I'm sure

12 you could tell me how I look at these as I hold them up

13 without a computer to see what's on them.

14 But if they are consistent with what I have,

15 then there are a lot of documents that are on here, in fact,

16 the vast majority that are not responsive to your subpoena

17 and have nothing to do with this case.

18 BY MR. WYATT:

19 Q When did you turn the documents over to

20 Mr. Canada before coming here today, Ms. Williams?

21 A I didn't turn them over to him before coming

22 here today.

23 Q Mr. Canada obviously has possession of the

24 documents and disks, right?

25 A Yes.

1762521e-1782-4828-47bb-14711d0077ad

Page 178

1 Q How did he get possession of that?

2 A I showed it to him as I came here today.

3 Q So the documents that this order commanded you

4 to produce, you, on your own, went and showed those to

5 Mr. Canada before testifying here today; is that right?

6 A Was it before?

7 MR. CANADA: I frankly I don't recall.

8 THE WITNESS: I don't recall. At some point

9 this morning. After I arrived here.

10 BY MR. WYATT:

11 Q Did anyone authorize you to do that?

12 A No.

13 Q Okay. I'll ask for the last time, okay, and

14 then we'll have to -- from here we have to go to court about

15 this. Okay.

16 I'm asking you to produce the documents that

17 you've been commanded to produce pursuant to this subpoena

18 and tender them to us here and now.

19 A Evidently I don't have access to the specific

20 documents in a format that I can give you at this point.

21 Apparently that's my mistake. I'm happy to give you the

22 documents as soon as I can return CDs for you.

23 Q No, ma'am. I'm talking about the CDs that are

24 sitting here on the table.

25 MR. WYATT: Let's get a video.

1782321e-0782-4828-4706-1471148077ad

Page 180

1 A That's correct.

2 Q But at some point today, either before or during

3 the deposition, you turned those over to Mr. Canada?

4 A Yes.

5 Q And you reviewed those with Mr. Canada?

6 A Yes.

7 Q All right. So you need to understand,

8 Ms. Williams, that this subpoena does not authorize you to

9 withhold those disks from us today. But if you choose to do

10 so, you need to understand that you're choosing to do so at

11 your peril. That's all I have to say about that.

12 What happens next will be a proceeding in the

13 United States District Court, District of Nevada, to hold you

14 in contempt. I would prefer not to do that.

15 A Are you waiting for a response from me?

16 Q Yes, ma'am, I am.

17 MR. CANADA: I didn't think that was a question.

18 THE WITNESS: I didn't think that was a

19 question, I'm sorry.

20 I would like to give you the information

21 requested in the subpoena. Unfortunately, I don't have a

22 computer with me either. So I need to give that to you, send

23 that to you, FedEx that to you as soon as I get home tonight.

24 BY MR. WYATT:

25 Q Not in compliance with the subpoena. You

1782321e-0782-4828-4706-1471148077ad

Page 179

1 Q Ms. Williams, would you mind taking these, and

2 this is what you're withholding from this subpoena here

3 today, correct? Let's take them one by one. I want you to

4 hold them up for the videographer so that he can show what's

5 written on the front of the CD.

6 And that one says "FAEC photos, cases 530-089

7 through 530-155."

8 Did I read that right, Ms. Williams?

9 A Yes.

10 Q What's the next one? "FAEC photos, cases

11 530-001 through 530-079," disk number two.

12 And the next one is -- it would be the other

13 side, please, number three. That would be "All FAEC

14 reports." And the backside is number four, "Jack Kelly

15 notes, Kergosien info, miscellaneous SF Mullins info, Cat

16 team info."

17 Did I read that right?

18 A Yes.

19 Q The next one. Number five, "SF Katrina

20 e-mails," that's State Farm, isn't it?

21 A Yes.

22 Q The back of that?

23 A That's the last one.

24 Q You brought those disks here today pursuant to

25 the subpoena that was served on you?

1782321e-0782-4828-4706-1471148077ad

Page 181

1 understand that the subpoena has a date and time for

2 compliance. Maybe perhaps you need to look at this.

3 Are you familiar with the United States District

4 Court subpoena? Do you know what the power and import of it

5 is?

6 A Evidently not. But I'm finding out real fast.

7 Q Let me just inform you that what you will find

8 out from here on will be a lot more poignant than what you're

9 finding out right now.

10 This says December 14, 2006, at 9:00 a.m., it is

11 a court order that you are to produce what is asked for in

12 this subpoena.

13 A Yes, I understand that.

14 Q So it doesn't authorize you to give that

15 information to someone else for review. It doesn't authorize

16 you to hold that information back and tender it later. It

17 orders you to produce it to us today at the designated time

18 and place.

19 So if you choose not to do that, you're choosing

20 to be in contempt of the subpoena.

21 MR. CANADA: Counsel, it also doesn't authorize

22 or require her to turn over documents that are not responsive

23 to your subpoena. And that's what you're asking for.

24 MR. WYATT: And, Larry, for the record, I don't

25 want to create a side debate. I object to your intervening

1782321e-0782-4828-4706-1471148077ad

1 in our obtaining of evidence under a lawful subpoena. And I
2 think that could be construed as a serious violation of your
3 duties as an officer of the court.

4 You're not representing this person. You really
5 have no right whatsoever to take the information from the
6 witness and independently decide whether the witness is going
7 to produce the information pursuant to the subpoena.

8 So no personal grudges intended or meant
9 whatsoever, but I would tread very carefully.

10 I think that you're not authorized to do that,
11 and it could be a serious violation.

12 MR. CANADA: Apparently everything I do is a
13 serious violation, Derrick. I'm not taking it personally.
14 We both have jobs to do.

15 MR. WYATT: Please don't.

16 MR. CANADA: I don't.

17 BY MR. WYATT:

18 Q Ms. Williams, I'm not going to keep going
19 through this. We'll just go to the court is what we'll do.
20 But I'm telling you now that you need to understand what the
21 import of your actions are. That's all I'm saying.

22 If you choose not to do it, then you choose not
23 to do it, and you need to understand you are in contempt of
24 the order.

25 THE WITNESS: Okay.

1 MR. WYATT: What time did we go off the record?

2 THE VIDEOGRAPHER: 2:19.

3 MR. WYATT: It's what?

4 THE VIDEOGRAPHER: 2:21.

5 BY MR. WYATT:

6 Q What happened in the last minutes that we were
7 off the record, Ms. Williams?

8 A I had a discussion with Mr. Canada.

9 Q Mr. Canada, okay. And what was that discussion?

10 A That discussion was, what was I supposed to do
11 at this point? Unfortunately, these subpoenas don't come
12 with rules, as I mentioned earlier.

13 Here you go.

14 Q Okay. So you're doing this because you talked
15 with Mr. Canada. You're now complying with the subpoena; is
16 that right?

17 A I'm doing that because Mr. Canada gave me very
18 good advice. He said, "Do what you think you should do."

19 Q And, again, Ms. Williams, Mr. Canada is not your
20 attorney; is that right?

21 A No, he is not.

22 Q All right. Now, Ms. Williams, these disks that
23 you have tendered now contain what? Do they contain the
24 entire information that you reproduced after you were told
25 that Forensic was served with a subpoena?

1 BY MR. WYATT:

2 Q You choose to be in contempt?

3 A I reserve the decision until the end of this.

4 Q I'm sorry, what, ma'am?

5 A I reserve to make that decision until the end of
6 this deposition.

7 Q You're not entitled to do that, Ms. Williams.

8 You see what the subpoena says? That when you
9 are to produce the information right under this block right
10 here, and I'm pointing in Exhibit 21.

11 A Yes.

12 Q Okay. It says at 9:00 a.m. on December 14th.
13 You would agree with me that it is 2:15 a.m. Pacific time --
14 2:15 p.m. Pacific time as we sit here, is it not?

15 A I will take your word for that.

16 Q Okay. So as of this moment, if you are choosing
17 to refuse to produce the information to us, you're in
18 contempt.

19 A I need a break.

20 Q Okay. Fine.

21 THE VIDEOGRAPHER: We're off record at 2:19 p.m.
22 (Recess taken at 2:19 p.m.)

23 THE VIDEOGRAPHER: We're back on record at 2:21

24 p.m.

25 Please continue.

1 A Yes.

2 Q And the hardcopy information as well? That was
3 originally in hardcopy?

4 A A lot of this was never in hardcopy, but it's
5 everything that I had on the computer in North Carolina
6 electronically.

7 Q Electronically?

8 A Including e-mails and such.

9 Q Is there anything that it does not include?

10 A Yes.

11 Q What is that?

12 A It would be any of the hardcopy that was given
13 to me by anybody in this case. I don't have access to the
14 faxes from State Farm. I don't have access to Jack's
15 handwritten notes, the engineers' handwritten notes, those
16 types of items. Those are still sitting in Raleigh in the
17 file that I had given them before I left. That was the
18 complete package of items I had given in response to the
19 subpoena and to Mr. Canada.

20 Q Did you have the phone records of Forensic? Was
21 that something that you managed while you were employed by
22 Forensic?

23 A What do you mean by phone records?

24 Q Phone records.

25 A Like the telephone bills?