

DEPOSITION OF  
SARAH SAEZ  
ARAUZ V. UFCW LOCAL 135  
TAKEN ON  
DECEMBER 13, 2017



PHONE 855.525.3860 | 323.938.8750

1 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
2 COUNTY OF SAN DIEGO - CENTRAL DIVISION  
3 ANABEL ARAUZ, )  
4 Plaintiff, )  
5 vs. )  
6 UNITED FOOD & ) Case No.  
7 COMMERCIAL WORKERS ) 37-2017-00013268-CU-WT-CTL  
8 LOCAL 135, a labor )  
9 union charter; and DOES )  
10 1 through 20, )  
11 Defendants. )  
12 \_\_\_\_\_ )  
13 DEPOSITION OF  
14 SARAH SAEZ  
15 SAN DIEGO, CALIFORNIA  
16 DECEMBER 13, 2017  
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21  
22  
23  
24 Reported by:  
25 FRAN BARBER  
CSR NO. 13811  
17-58113

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ALSO PRESENT: Anabel Arauz, Plaintiff

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
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8 LOCAL 135, a labor )  
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11 Defendants. )  
12 \_\_\_\_\_ )  
13  
14 The deposition of SARAH SAEZ, taken on behalf  
15 of the Plaintiff, at 17140 Bernardo Center Drive, Suite  
16 358, San Diego, California, beginning at 9:08 a.m. and  
17 ending at 11:46 a.m. on Wednesday, December 13th, 2017,  
18 before FRANCES BARBER, Registered Professional Reporter  
19 and Certified Shorthand Reporter No. 13811.  
20  
21  
22  
23  
24  
25

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1 SAN DIEGO, CALIFORNIA  
2 DECEMBER 13TH, 2017  
3 WHEREUPON:  
4 SARAH SAEZ,  
5 called as a witness herein, having been first duly  
6 sworn, was examined and testified as follows:  
7 EXAMINATION  
8 BY MR. CORRALES:  
9 Q. Good morning, ma'am.  
10 A. Good morning.  
11 Q. Could we have your full name, please.  
12 A. Sarah Saez.  
13 Q. Middle name?  
14 A. No.  
15 Q. Okay. Ms. Saez, have you ever had a  
16 deposition taken before?  
17 A. No.  
18 Q. Do you understand what a deposition is?  
19 A. Yes.  
20 Q. Okay. Just so that we both understand each  
21 other in terms of what's going to happen today, let me  
22 go over some rules and guidelines that we need to kind  
23 of be aware of.  
24 A. Uh-huh.  
25 Q. First of all, you understand that the

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1 deposition today is being taken under penalties of  
2 perjury?  
3 A. Yes.  
4 Q. You understand that if you do not tell the  
5 truth in today's deposition, you can be punished?  
6 A. Yes.  
7 Q. It's a crime. Do you understand that?  
8 A. Yes.  
9 Q. Okay. And because of the nature of the  
10 deposition procedure, we have a court reporter who's  
11 taking down everything that is being said in the room,  
12 so if somebody speaks, somebody objects, you know, a  
13 lawyer, anybody, even, I don't know, somebody that's not  
14 supposed to be deposed says something, the court  
15 reporter is obligated to write that down or type that  
16 in.  
17 A. Okay.  
18 Q. But she can't do that if everybody is talking  
19 at the same time.  
20 A. Yes.  
21 Q. So if there's a commotion, people get upset  
22 and everybody is talking fast and over one another,  
23 she's going to say time out. I'm not going to be able  
24 to record all this.  
25 A. Okay.

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1 Q. So to help her, please wait until I finish my  
2 question before you respond. Okay?  
3 A. Yes.  
4 Q. And then if your attorney has an objection --  
5 I'm assuming you're being represented by Mr. Four?  
6 A. Yes.  
7 Q. Okay. If your attorney has an objection, wait  
8 till he finishes his objection before you respond.  
9 Okay?  
10 A. Yes.  
11 Q. Okay. It may be that he will -- doesn't want  
12 you to say anything. He may instruct you not to answer  
13 the question and then you will just kind of get ahead of  
14 him and that wouldn't be good. Okay?  
15 A. Yes.  
16 Q. All right. Also, give us verbal words rather  
17 than gestures. Noises people make in conversations, it  
18 doesn't assist the court reporter. Okay?  
19 A. Yes.  
20 Q. All right. If you have any questions about my  
21 questions, if you don't understand it, it's not a test,  
22 you're not going to be graded on this, so if you don't  
23 quite understand what I'm saying, tell me and I will  
24 either have the court reporter repeat it, I may rephrase  
25 it for you to make sure that you understand the

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1 question. Okay?  
2 A. Yes.  
3 Q. And it's important because once you do answer  
4 a question we, the jury, the judge, anybody that reads  
5 the transcript will assume that you understood the  
6 question. Okay?  
7 A. Yes.  
8 Q. All right. Are you under the influence of  
9 alcohol today?  
10 A. No.  
11 Q. Are you taking any form of medication,  
12 prescribed or not, that you believe might impact your  
13 testimony?  
14 A. No.  
15 Q. Okay. Is there any reason why we can't take  
16 your deposition today?  
17 A. No.  
18 Q. All right. So Ms. Saez -- is it Saez or Saez?  
19 A. Saez.  
20 Q. Ms. Saez --  
21 A. Yeah.  
22 Q. -- are you a high school graduate?  
23 A. Yep.  
24 Q. What high school did you graduate from?  
25 A. Sharon High School.

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1 Q. Where is that at?  
 2 A. It's in Massachusetts.  
 3 Q. All right. What year was that?  
 4 A. 1998.  
 5 MR. FOUR: I'm sorry, I didn't hear what you said.  
 6 The answer?  
 7 THE WITNESS: Oh, Sharon.  
 8 MR. FOUR: No, no, I'm sorry, the year you said you  
 9 graduated.  
 10 THE WITNESS: Oh, 1998.  
 11 BY MR. CORRALES:  
 12 Q. Did you attend college?  
 13 A. Yes.  
 14 Q. Which college?  
 15 A. I went to Barry University for my bachelor's.  
 16 Q. Bear?  
 17 A. Barry.  
 18 Q. Where is that at?  
 19 A. It's in Miami. And then I got my master's  
 20 degree from University of San Diego.  
 21 Q. Was it a B.S. or B.A. degree?  
 22 A. It was a B.S., Bachelor of Science.  
 23 Q. In what?  
 24 A. Criminology, sociology.  
 25 Q. And then you went to San Diego State?

Page 10

1 A. I went to USD, University of San Diego.  
 2 Q. University of San Diego. What did you study  
 3 there?  
 4 A. Nonprofit management and leadership.  
 5 Q. Nonprofit, okay. Management?  
 6 A. Yep.  
 7 Q. And how long did you go there?  
 8 A. Two years.  
 9 Q. Did you get a degree?  
 10 A. Yes, I got my master's, Master of Arts.  
 11 Q. Master of Arts in what?  
 12 A. Nonprofit management and leadership.  
 13 Q. Okay. Did you ever go to law school?  
 14 A. I did, for a year.  
 15 Q. Which law school?  
 16 A. That was Thomas Jefferson here in San Diego.  
 17 Q. When you say one year --  
 18 A. I dropped out.  
 19 Q. You dropped out?  
 20 A. I am a law school dropout.  
 21 Q. All right. Did you complete the year?  
 22 A. Yes.  
 23 Q. Okay. When did you go to law school?  
 24 A. Oh, it was seven years ago.  
 25 Q. What year basically was that? Do you

Page 11

1 remember?  
 2 A. That was 2010.  
 3 Q. Okay. Approximately?  
 4 A. Yes.  
 5 Q. When did you obtain your master's degree?  
 6 A. I got my master's degree in 2015, I believe.  
 7 Q. All right.  
 8 A. Or was it '14? It might have been '14.  
 9 Q. All right. And your B.S. degree, when did you  
 10 get that?  
 11 A. I got that in -- I don't remember. 2000- --  
 12 so I don't remember. 2004, I want to say.  
 13 Q. Is that your best estimate?  
 14 A. Yeah, that's my best estimate.  
 15 Q. Okay.  
 16 A. Sorry.  
 17 Q. That's okay. All right. Any other colleges  
 18 or schools that you attended?  
 19 A. No.  
 20 Q. What's your present employment?  
 21 A. I am a union representative at United Food and  
 22 Commercial Workers.  
 23 Q. Is that 135?  
 24 A. Local 135.  
 25 Q. When you say union rep --

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1 A. Yeah.  
 2 Q. -- how long have you been a union rep there?  
 3 A. It will be two years in July.  
 4 Q. All right. Before working for Local 135,  
 5 where did you work?  
 6 A. I worked at United Taxi Workers of San Diego.  
 7 Q. Taxi, is that like a union?  
 8 A. It's a union. It's a worker center, yeah.  
 9 Q. Is there a number associated with that?  
 10 A. There is now, but there wasn't when I worked  
 11 there.  
 12 Q. Okay. What did you do there?  
 13 A. I was program director and policy director.  
 14 Q. What years did you work there?  
 15 A. I worked there from 2011 to 2016.  
 16 Q. What did you do?  
 17 A. Oh, everything from organizing -- I mean, I  
 18 was program director, so I pretty much oversaw the  
 19 organization.  
 20 Q. You did organizing work?  
 21 A. Yes, uh-huh.  
 22 Q. Okay. Where did you work before that?  
 23 A. Before that I was in school and before that I  
 24 was a waitress during my bachelor's degree.  
 25 Q. Where at?

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1 A. Flanigan's. I worked there for almost five  
2 years.  
3 Q. Flanigan's?  
4 A. Waitress/bartender there.  
5 Q. Where is that?  
6 A. That's in Miami.  
7 Q. Miami?  
8 A. Yep.  
9 Q. And just on and off, part-time?  
10 A. No, pretty much full-time while I was going to  
11 school.  
12 Q. What years?  
13 A. While I was at Barry. I don't remember. It  
14 was when I lived in Miami, so I want to say 2004 to  
15 2008, 2009.  
16 Q. Any other jobs you've had?  
17 A. Yeah. I've -- well, I've had --  
18 Q. Where did you work?  
19 A. Yeah. So I interned at the ACLU during that  
20 period.  
21 Q. Interned at ACLU?  
22 A. Yep.  
23 Q. Where is that? In Miami?  
24 A. That was in Miami, yes.  
25 Q. When you say intern, what did you do there?

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1 A. I was a legal intern.  
2 Q. Doing what?  
3 A. So I fielded all inquiries from the public in  
4 regards to the work of the ACLU.  
5 Q. You were -- like, you were an intake person?  
6 A. Yeah, uh-huh.  
7 Q. Okay. And what years did you do that?  
8 A. I don't remember. I wish I brought my resume.  
9 2000- -- I want to say 2006. That's approximate.  
10 Q. Just one year?  
11 A. It was one year, yeah.  
12 Q. Okay. Where did you work before that?  
13 A. Before that -- where did I work before that?  
14 I was a waitress again. Actually, no, before that I  
15 actually did fundraising for my college, Barry  
16 University.  
17 Q. Fundraising?  
18 A. Uh-huh, I worked at the call center.  
19 Q. The call center?  
20 A. The call center.  
21 Q. How do you --  
22 A. Sorry, I have an East Coast accent sometimes.  
23 Q. Oh, call center. What years did you do that  
24 work?  
25 A. I want to say that was around 2005, 2006.

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1 Q. Did you get paid for that?  
2 A. Yes.  
3 Q. Okay. And what was the -- what was the  
4 company or what was the --  
5 A. It was Barry University.  
6 Q. Just Barry University?  
7 A. Yeah. We would call people for donations,  
8 alumni.  
9 Q. I see, all right. Okay. Where did you work  
10 before that?  
11 A. Okay. So before that I worked in Boston and I  
12 was a waitress at various places.  
13 Q. Okay. What years do you think that was?  
14 A. So before I moved to Miami. I would say 2003  
15 to before that.  
16 Q. Okay.  
17 A. Yeah.  
18 Q. All right. Any other jobs you had?  
19 A. Not paid. Mostly all volunteer. I've been on  
20 a lot of boards in the community.  
21 Q. All right.  
22 A. Yeah.  
23 Q. Did you ever run for political office?  
24 A. I did.  
25 Q. When was that?

Page 16

1 A. That was in 2015.  
2 Q. What was it?  
3 A. It was for District 9 city council.  
4 Q. District 9?  
5 A. Uh-huh.  
6 Q. What city?  
7 A. City of San Diego.  
8 Q. Okay. Did you -- was there an election?  
9 A. Yes.  
10 Q. And were you elected?  
11 A. No. I did make it through the primaries, but  
12 I was not elected.  
13 Q. Okay. Was there any fundraising involved?  
14 A. Yes.  
15 Q. Okay. Who did you get money from?  
16 A. Various people.  
17 Q. Donations?  
18 A. Yeah, donations.  
19 Q. Was there a limit of how much money you can  
20 get?  
21 A. Yeah, so in the city I believe it was \$500 --  
22 Q. \$500?  
23 A. -- per person and then \$1,000 per couple, I  
24 believe.  
25 Q. Okay.

Page 17

1 A. Yeah.  
 2 Q. How about, like, for companies?  
 3 A. No, we couldn't get -- it was only individuals  
 4 that I could get to my campaign. If people had  
 5 independent expenditures, that was separate and I  
 6 wouldn't be able to communicate with them.  
 7 Q. Did you ever receive any money from Mickey  
 8 Kasparian?  
 9 A. Yes, him and his wife.  
 10 Q. Okay. And how much was that?  
 11 A. I believe it was maybe -- not much. I think  
 12 it was \$250.  
 13 Q. Did you ever -- did Mickey to your knowledge  
 14 ever spend more money than that for your campaign?  
 15 A. I don't --  
 16 MR. FOUR: Objection, calls for speculation.  
 17 You can answer it to the extent you know.  
 18 THE WITNESS: I don't know because it was an  
 19 independent expenditure. I don't think him as an  
 20 individual could have done that --  
 21 BY MR. CORRALES:  
 22 Q. Done what?  
 23 A. -- outside of my campaign.  
 24 Given money. Are you saying the UFCW or are  
 25 you saying Mickey?

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1 Q. Either one.  
 2 A. Oh, okay. UFCW, I believe, did have an  
 3 independent expenditure, but I wasn't able to coordinate  
 4 with them.  
 5 Q. Do you know how much that was?  
 6 A. No.  
 7 Q. Did you ever hear that it was about \$100,000?  
 8 A. I believe I heard that, but it was after my  
 9 campaign.  
 10 Q. Okay. And to your knowledge, how would the  
 11 Local 135 contribute \$100,000 or any amount like that?  
 12 A. Members pay into an active ballot club which  
 13 is separate of the general fund and that money goes into  
 14 political campaigns.  
 15 Q. Okay. So you found out after the campaign was  
 16 over how much money the local contributed?  
 17 A. It sounded familiar.  
 18 MR. FOUR: Objection, misstates the testimony.  
 19 You can answer.  
 20 THE WITNESS: Okay. Okay. It sounded familiar.  
 21 BY MR. CORRALES:  
 22 Q. It sounds familiar?  
 23 A. Yeah, but I don't recall exactly who told me  
 24 that, how much they spent.  
 25 Q. Okay.

Page 19

1 A. Yeah.  
 2 Q. So after the campaign was over, after you lost  
 3 the campaign --  
 4 A. Uh-huh.  
 5 Q. -- what happened? Where -- where did you go  
 6 to work?  
 7 A. I continued to work at United Taxi Workers.  
 8 Q. United Taxi Workers?  
 9 A. Yeah.  
 10 Q. For how long?  
 11 A. I believe I still worked there for -- I want  
 12 to say six months maybe.  
 13 Q. Okay. And what happened after that?  
 14 A. And then I started working at United Food and  
 15 Commercial Workers.  
 16 Q. How did you get the job at United Food?  
 17 A. Sandy Naranjo actually referred me. She told  
 18 me that she wanted me to apply to work there.  
 19 Q. Okay. So you weren't contacted by Mickey?  
 20 A. After the fact.  
 21 Q. Okay. When you say -- after what fact?  
 22 A. After Sandy said that I should apply and get  
 23 in touch with Mickey.  
 24 Q. Okay. So what -- to your knowledge, what was  
 25 going on that prompted Sandy to recommend you to work

Page 20

1 for Local 135 since you already had a job at United Taxi  
 2 Workers?  
 3 A. I just wanted to move on. I had worked there  
 4 for almost six years.  
 5 Q. Were you dissatisfied with your job?  
 6 A. Not dissatisfied, but I wanted to do something  
 7 different. And as a refugee -- mostly African refugee  
 8 run organization and it was always my intention to let  
 9 them run their own organization and I felt that that  
 10 time and that transition was appropriate.  
 11 Q. Okay. So you applied -- how did you apply at  
 12 135?  
 13 A. I didn't apply. So what happened was I met  
 14 with Mickey and he told me to go on a ride-along with  
 15 one of the senior reps, Tom, and I did that. We spent  
 16 the day together. And then I let Mickey know that it  
 17 was something that I was interested in doing and he  
 18 hired me.  
 19 Q. Okay. So you say you met -- how did you  
 20 happen to meet with Mickey? How did that occur?  
 21 A. We set up a meeting and I met at his office.  
 22 Q. Okay. When you say you set up a meeting --  
 23 A. Yes.  
 24 Q. -- how did you set up a meeting? You say  
 25 Sandy referred you to Local 135 --

Page 21

1 A. Yeah.  
 2 Q. -- encouraged you to apply.  
 3 A. She did.  
 4 Q. So what did you do to apply? Did you call  
 5 Mickey or did you just --  
 6 A. Yeah, I called Mickey.  
 7 Q. So when you called him, what did you say?  
 8 A. I said, Mickey, I'm interested.  
 9 Q. Did he know who you were?  
 10 A. Yes.  
 11 Q. How did he know who you were?  
 12 A. I've known Mickey for years because he was the  
 13 president of the labor council and I was a delegate of  
 14 the labor council.  
 15 Q. And did he support you in your campaign?  
 16 A. Yes.  
 17 Q. Okay. So he knew you from that as well?  
 18 A. Yeah.  
 19 Q. Okay. And to your knowledge, he arranged to  
 20 have money from the Local 135 contribute to your  
 21 campaign, correct?  
 22 A. Yes --  
 23 Q. Okay. So --  
 24 A. -- but I don't know the amounts or the  
 25 details.

Page 22

1 Q. You said that.  
 2 A. Yeah.  
 3 Q. Okay. So when you talked to Mickey on the  
 4 phone --  
 5 A. Yes.  
 6 Q. -- what did you say about being referred by  
 7 Sandy, if anything?  
 8 A. I don't remember.  
 9 Q. Did you say Sandy asked me to call you or  
 10 Sandy referred me?  
 11 A. I believe -- I do believe that, that I did  
 12 tell him that Sandy told me to ask him about the job --  
 13 Q. Okay. When you say --  
 14 A. -- if there was a --  
 15 Q. -- you do believe that --  
 16 A. Yes.  
 17 Q. -- are you guessing or do you remember that?  
 18 A. I'm guessing. I don't remember.  
 19 Q. Okay. So you called him on the phone and what  
 20 did you say about your interest in working for  
 21 Local 135?  
 22 A. I just told him that I was interested in  
 23 moving on.  
 24 Q. Okay. Did you tell him you were dissatisfied  
 25 with your work?

Page 23

1 A. No.  
 2 Q. Okay. And then that's when he suggested a  
 3 ride-along with Tom?  
 4 A. Yes.  
 5 Q. And then after that, you called him again or  
 6 did he call you?  
 7 A. I called him, I believe.  
 8 Q. What did you tell him?  
 9 A. I told him that it's something that I was  
 10 interested in doing.  
 11 Q. Okay. And did you -- was the ride-along  
 12 something for Tom to assess as to whether or not you  
 13 were a good fit or was it just --  
 14 A. I believe so.  
 15 Q. Hang on, let me finish. Or was it something  
 16 that you were doing to see if you wanted to work there?  
 17 MR. FOUR: Objection, calls for speculation as to  
 18 Tom's role.  
 19 But you can answer.  
 20 THE WITNESS: I believe it was both because Mickey  
 21 told me that he got feedback from Tom. That he bel- --  
 22 Tom believed I was a good fit.  
 23 BY MR. CORRALES:  
 24 Q. Okay. All right. So how were you hired?  
 25 A. Mickey hired me.

Page 24

1 Q. Orally? Was there a contract?  
 2 A. He showed me the contract for the union  
 3 representatives and it was again for me to make my  
 4 decision if I wanted to come work there.  
 5 Q. Okay. So you looked at the contract before  
 6 you signed it --  
 7 A. Uh-huh.  
 8 Q. -- and made a decision?  
 9 A. Yes, he -- about salary.  
 10 Q. How long did it take you to --  
 11 MR. FOUR: Objection, misstates testimony that she  
 12 signed any contract.  
 13 BY MR. CORRALES:  
 14 Q. How long did it take you to sign the contract?  
 15 A. I didn't sign a contract.  
 16 Q. Okay. So what was the contract you're talking  
 17 about?  
 18 A. So the union representatives have a contract  
 19 that outlines what holidays they have off, what salaries  
 20 they get paid, things like that. So I just looked at  
 21 that. I didn't sign it.  
 22 Q. Okay. Did you understand that it was a  
 23 contract or did you understand that it was just an  
 24 outline of benefits?  
 25 A. At the time I didn't understand that it was a

Page 25

1 contract, now I do.  
2 Q. To your knowledge, was it or wasn't it a  
3 contract?  
4 A. At the time I didn't know.  
5 Q. You didn't know?  
6 A. No.  
7 Q. Did you ever sign a document that you  
8 understood to be a contract?  
9 A. No.  
10 Q. Okay. So --  
11 MR. FOUR: Let's go off the record for one second,  
12 please.  
13 THE WITNESS: Yeah.  
14 (A short break was had.)  
15 BY MR. CORRALES:  
16 Q. Back on the record.  
17 So did you understand that you actually signed  
18 a contract?  
19 A. No, I did not sign a contract.  
20 Q. Okay.  
21 A. It was a collective bargaining agreement  
22 which --  
23 Q. Okay. What is -- go ahead.  
24 A. -- which is -- outlines out -- the rules and  
25 regulations around what our rights are on the job.

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1 Q. Okay.  
2 A. And we have a union that negotiates that.  
3 Q. Did you ever -- did you ever negotiate a  
4 salary with Mickey?  
5 A. No.  
6 Q. Okay. So what did you understand you were to  
7 be paid per week?  
8 A. At the time I don't remember. I don't  
9 remember, but it was more than I was making at United  
10 Taxi Workers.  
11 Q. Well, did you ever get an increase in pay?  
12 A. We do and it's based on the collective  
13 bargaining agreement. So my first year there I got an  
14 increase and it goes by year. Every year you get an  
15 increase.  
16 Q. So how much are you making now?  
17 A. Right now before taxes I believe I make 1,200  
18 a week.  
19 Q. Okay. And that was --  
20 A. After taxes I know it's 840.  
21 Q. But before that it was less, right?  
22 A. Yes.  
23 Q. And how much was it before?  
24 A. When I was working at United Taxi Workers I  
25 maybe -- and this is approximate -- I maybe made 45,000.

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1 Q. A week?  
2 A. A year.  
3 Q. No, per week.  
4 A. I believe I got 770 a week.  
5 Q. So when you started working for Local 135, you  
6 were making more?  
7 A. Yes.  
8 Q. But it was less than \$1,200 a week?  
9 A. Yes.  
10 Q. And you're saying you don't know what that  
11 is --  
12 A. No.  
13 Q. -- when you first started working there?  
14 A. It -- it -- it was -- no, I don't. I'm sorry.  
15 Q. Was it \$1,050 a week?  
16 A. That sounds around what I was making, yes.  
17 Q. Did you ever understand that you were making  
18 more than what everyone else was making when you first  
19 started working at 135?  
20 A. No, I wasn't.  
21 Q. You're saying you weren't, how do you know  
22 that?  
23 A. So there were two other reps, Beatrice and  
24 Mike who were also in their first year, so we were all  
25 being paid the same amount.

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1 Q. How do you know that?  
2 A. Because we talked about it.  
3 Q. You talked about it. Okay. So who was the  
4 other person?  
5 A. Beatrice.  
6 Q. Beatrice. And who else?  
7 A. And Mike.  
8 Q. And Mike who?  
9 A. Mike Bracamontes.  
10 Q. And they were both organizers?  
11 A. They were union representatives.  
12 Q. Union reps?  
13 A. Yes. I don't know what the organizers made,  
14 if they made more or less than us.  
15 Q. Okay. Now, when you first started working at  
16 Local 135, what year was that?  
17 A. It was 2016.  
18 Q. So the date of your hire was someplace --  
19 A. July -- July 2016.  
20 Q. July 2016.  
21 A. Uh-huh.  
22 Q. Were you hired at the time that Isabel Vasquez  
23 was still working there?  
24 A. No, she retired before I even worked there.  
25 Q. Okay. So it was after -- and you heard of



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1 Ms. Vasquez, right?  
2 A. I heard of her. I have some of her stores.  
3 Q. Okay. So after Vasquez had left you started  
4 working?  
5 A. Yes.  
6 Q. In July of 2016?  
7 A. Yes.  
8 Q. And she was a rep as well?  
9 A. Yes.  
10 Q. Do you know if you replaced her?  
11 A. No, that's not how it works.  
12 Q. Well, you said that you had --  
13 A. I had some of her stores.  
14 Q. -- some of her stores.  
15 A. So did Beatrice and other representatives.  
16 Q. Okay.  
17 A. So we don't replace each other. Sometimes you  
18 get the stores that they represented, but other people  
19 had stores that she represented upon her retirement as  
20 well.  
21 Q. Okay. So did you understand that you were  
22 just getting new stores, new assignments, when you were  
23 hired?  
24 A. Yes.  
25 Q. Okay. When you began working at Local 135,

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1 did you get to know some of the organizers?  
2 A. Yes.  
3 Q. Who were they?  
4 A. At the time it was Maribel --  
5 Q. Okay.  
6 A. -- McKenzie, Anabel.  
7 Q. Anabel.  
8 A. Sandy.  
9 Q. Okay. Sandy who?  
10 A. Sandy Naranjo.  
11 Q. Okay.  
12 A. And I want to say that Jerry Singh was -- I'm  
13 not sure if Jerry was working there when I first worked  
14 there, but he was -- he was hired either after that or  
15 he was there when I was there.  
16 Q. Jerry Singh?  
17 A. Uh-huh. And I'm not sure if he was working  
18 there when I was working there.  
19 Q. But you knew him?  
20 A. Yes.  
21 Q. So you saw him at Local 135?  
22 A. He was an employee there, yes.  
23 Q. When you say he was an employee there, did you  
24 actually see him there?  
25 A. Yes, he was an organizer.

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1 Q. So he was working there when you were working  
2 there?  
3 A. Yes, I just don't know if he was working there  
4 when I first started. I don't remember.  
5 Q. I see.  
6 A. He might have been hired after me.  
7 Q. Okay.  
8 A. Actually, no, he was there when I first  
9 started.  
10 Q. Okay.  
11 A. Yeah.  
12 Q. And did he leave after you -- did he leave  
13 sometime afterwards?  
14 A. Yes, he just recently left.  
15 Q. What's recent?  
16 A. In the last two months.  
17 Q. Okay. Do you know why?  
18 A. He got another job in LA closer to family with  
19 the teachers union.  
20 Q. Okay. So as a union rep, did you interact  
21 with the organizers?  
22 A. Sometimes.  
23 Q. How?  
24 A. Mostly at rallies.  
25 Q. Okay.

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1 A. And shared events.  
2 Q. Okay. What kind of shared events?  
3 A. Rallies or any kind of events, like political  
4 events.  
5 Q. Did you get to know some of the organizers?  
6 A. Yes.  
7 Q. All of them?  
8 A. Yes.  
9 Q. Did you become friends with any of them?  
10 A. Yes.  
11 Q. Which ones?  
12 A. I would say Sandy mostly, but I was friends  
13 with Sandy before I worked at UFCW.  
14 Q. How did you get to know Sandy before you  
15 started working at 135?  
16 A. Through the labor movement. We were both  
17 actually down -- I met Sandy at Occupy San Diego.  
18 Q. At what?  
19 A. Occupy San Diego.  
20 Q. What is that?  
21 A. It was a protest where we slept down at --  
22 downtown San Diego in tents and I met her there.  
23 Q. Okay. When did you become friends -- first  
24 become friends with Sandy?  
25 A. I would say around then. Me and Sandy started

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1 organizing from our -- with our friend Raul Carranza who  
2 has muscular dystrophy, so we did a bunch of protests  
3 and organized a bunch of protests because he was losing  
4 his medical care.  
5 Q. When did you become friends with Sandy?  
6 A. Around that time. When was Occupy? I'm not  
7 sure what year that was now. I want to say 2012.  
8 Q. Okay.  
9 A. Around 2012.  
10 Q. And what was it about your friendship that  
11 made you believe that you were friends?  
12 A. We would organize a lot together and go to  
13 events together.  
14 Q. Did you spend personal time together?  
15 A. Yes, not so much back then, but eventually  
16 throughout our friendship we did.  
17 Q. Okay. When did you first start spending  
18 personal time together?  
19 A. I don't remember. I can't pinpoint it.  
20 Q. Was it after you began working at Local 135?  
21 A. Before.  
22 Q. Before?  
23 A. Yes.  
24 Q. Okay. And what kinds of things did you do  
25 together?

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1 A. Various things --  
2 Q. Like what?  
3 A. -- that friends would do. Talk on the phone.  
4 I was in her wedding.  
5 Q. In her wedding?  
6 A. I was in her wedding. She made me a  
7 bridesmaid in her wedding.  
8 Q. All right. So did you know her husband?  
9 A. I did, Andrew McKercher.  
10 Q. All right. Did you become friends with him?  
11 A. No, I wouldn't say me and Andrew were friends.  
12 Q. Okay. Did you like him when you were friends  
13 with Sandy?  
14 A. Yes and no.  
15 Q. When you say "yes and no," what do you mean by  
16 that?  
17 A. I liked him because he worked in the labor  
18 movement, but I would say no for the fact that -- I  
19 mean, Sandy complained about him, so she was my  
20 friend --  
21 Q. Yeah.  
22 A. -- and she was dating somebody else right  
23 before him, so when she started dating Andrew I thought  
24 it was kind of quick, so I didn't -- yeah, yes and --  
25 yes and no.

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1 Q. Did he do anything to you that caused you not  
2 to like him?  
3 A. No, nothing to me particularly.  
4 Q. Okay. Did you ever tell Sandy that she  
5 shouldn't marry him?  
6 A. No.  
7 Q. Were you happy for her when she got married?  
8 A. Yeah.  
9 Q. Okay. When -- other than being a bridesmaid  
10 in her wedding, what other things did you do together?  
11 Did you go out together?  
12 A. Yeah.  
13 Q. Have lunch?  
14 A. Yeah, we had lunch.  
15 Q. Go shopping together?  
16 A. No, we didn't do shopping and stuff.  
17 Q. Describe the things that you did together.  
18 A. I would say we'd have lunch. We'd have lunch.  
19 Q. During the time that you were employed?  
20 A. Yes.  
21 Q. Was it a business lunch or did you have a  
22 social lunch with her?  
23 A. I had -- the one lunch that I can remember  
24 with her it was a business lunch. We were --  
25 Q. Okay. On weekends, you know, when you're not

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1 working --  
2 A. Yeah.  
3 Q. -- did you, like, go to Panera and say meet me  
4 at Panera's and we'll just hang out?  
5 A. No, not really.  
6 Q. Did you ever hang out with her?  
7 A. Not really. Not that much. I mean, like, for  
8 example, she had her daughter's first birthday party, so  
9 we went to her house and hung out.  
10 Q. Who is "we"?  
11 A. Me and my partner, Oliver.  
12 Q. Oliver.  
13 A. Uh-huh, and other coworkers from work were  
14 there.  
15 Q. Okay. Did you ever go to her house on  
16 different occasions just to visit?  
17 A. I went to her house maybe two or three times.  
18 Q. For what purpose?  
19 A. Well, she got a new house, so to see her new  
20 house.  
21 Q. Okay. Other than just to see her new house,  
22 did you ever go to her house to visit?  
23 A. No, not really.  
24 Q. Did she go to your house, apartment or  
25 whatever?

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1 A. She's been to my apartment probably once or  
2 twice.  
3 Q. Okay.  
4 A. Yeah.  
5 Q. But you still consider yourself to be friends?  
6 A. Yeah.  
7 Q. And did she ever offer to help you when you  
8 were working at Local 135?  
9 A. No. In what way?  
10 Q. With your job. You had questions, Sandy, how  
11 does that work? Or Sandy, whatever, let me help you  
12 with this.  
13 A. Yeah, not with my job. Sandy did give me a  
14 lot of advice about people in the office.  
15 Q. What kind of advice?  
16 A. She told me that she hated Anabel, that she  
17 hated Maribel.  
18 Q. She hated Anabel?  
19 A. Yes.  
20 Q. And she hated Maribel?  
21 A. Yes.  
22 Q. Did she say why?  
23 A. She said that Anabel was a narcissist.  
24 Q. And what did you understand that to mean?  
25 A. That she only cares about and talks about

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1 herself.  
2 Q. Okay.  
3 A. And Maribel, she didn't like Maribel. I mean,  
4 she -- she called her a bitch on occasion.  
5 Q. Okay. Did you agree with any of that?  
6 A. I didn't know them well enough. At one point  
7 I actually didn't want to listen to what she was saying  
8 about them and decided to build my own relationships  
9 with them.  
10 Q. Okay. And --  
11 A. Because she would say this all behind their  
12 backs, but not to their faces, so I was confused about  
13 that.  
14 Q. Did you think that Sandy was a backstabber?  
15 A. Yes.  
16 Q. Okay. Did you ever tell her that?  
17 A. I told her at one point that I couldn't base  
18 my relationship with them on what she was saying about  
19 them and because she was nice to their faces, but talked  
20 a lot behind their backs that I -- I was going to make  
21 my own relationships with them.  
22 Q. Okay. When you said that she talked a lot  
23 behind their backs --  
24 A. Yeah.  
25 Q. -- what kinds of things did she say about

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1 Anabel that -- that -- you say she talked a lot about  
2 her behind her back, what sort of --  
3 A. Yeah, well, she said that she told -- Anabel  
4 only talked about herself.  
5 Q. You said that.  
6 A. She told me that they were just mean to her.  
7 Q. They were mean to her?  
8 A. Yeah. She told me that she avoided the office  
9 because of Anabel and Maribel, that she didn't want to  
10 come to the office because of them.  
11 Q. Did she say how they were mean to her?  
12 A. She just said that they were -- she said that  
13 they were bitches to her. That's what she said.  
14 Q. Okay, bitches. She didn't give any specifics?  
15 A. No, she said that they sucked up to Mickey.  
16 Q. They sucked up to Mickey. Okay.  
17 A. Uh-huh. And then she also thought both of  
18 them -- she on many occasions questioned their  
19 intelligence.  
20 Q. Okay. Did she say why she questioned their  
21 intelligence?  
22 A. She just thought they were stupid. That's  
23 what she told me.  
24 Q. Okay. Anything else that she said?  
25 A. She said that in particular with Anabel that

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1 she was out to try to be organizing director because we  
2 had an -- they had another organizing director, Hermand,  
3 who was there before I worked there and she said that  
4 Mar- -- Anabel wanted that position, but she was too  
5 stupid to get the position.  
6 Q. Okay. Did she say why she was too -- she  
7 thought she was too stupid?  
8 A. She just thought that she was unintelligent.  
9 That's what she said.  
10 Q. She just -- she used the word "unintelligent"?  
11 A. No, I'm using that word. She said stupid.  
12 Q. Stupid, okay. All right. Anything else that  
13 she said that you believe was talking behind Anabel's  
14 back?  
15 A. I mean, she said a lot of bad stuff, but what  
16 else did she say about Anabel? I mean, it was an  
17 ongoing thing that she would talk about Anabel and  
18 Maribel.  
19 Q. Give me some more specifics if you can  
20 remember.  
21 A. Just that -- I mean, the things that stuck out  
22 to me most in my head is that she said she avoided the  
23 office because she didn't want to be around them.  
24 Q. Okay. And what did she say about Maribel that  
25 was a backstabbing thing, conversation?

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1 A. Well, yeah. She just said that Maribel was  
2 mean and nasty.  
3 Q. Okay.  
4 A. And that she was stupid as well.  
5 Q. Stupid, too. Okay. Anything else?  
6 A. That's about it. I remember one time Maribel  
7 was applying for a leadership development program and,  
8 again, Sandy said that she was too stupid and Sandy told  
9 me that she saw Maribel put what are her future  
10 aspirations and Maribel put that she was -- that she  
11 wanted to be political director at the Local and Sandy  
12 said that she was too stupid to be able to do that.  
13 Q. Okay. Anything else that you remember she  
14 said negative about Maribel?  
15 A. She used -- I mean, again, with both of them  
16 I -- she used to say that they were fake.  
17 Q. Fake? Okay.  
18 A. Uh-huh.  
19 Q. Did she give any specifics?  
20 A. No, she just said that they talked -- she  
21 believed that they talked behind their backs. She also  
22 said that they were jealous of her.  
23 Q. Jealous?  
24 A. Yeah, Anabel in particular. She said that  
25 Anabel bought her condo because she was jealous of her,

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1 of Sandy.  
2 Q. Okay.  
3 A. Because Sandy got married, had a baby, you  
4 know, got her house and she said that Anabel was jealous  
5 of her, both of them were jealous of her, but Anabel in  
6 particular bought her condo because she was jealous of  
7 Sandy.  
8 Q. That's what Sandy said?  
9 A. Yes.  
10 Q. Okay. You never heard Anabel say that?  
11 A. No, I never talked to Anabel about Sandy.  
12 Q. Okay. Did you ever -- and you -- you told  
13 Sandy that you didn't want to hear a lot this stuff, you  
14 wanted to make your own assessment?  
15 A. At one point, yes. I said -- because, for me,  
16 I mean, Sandy was very adamant about them being jealous  
17 about her --  
18 Q. Yes.  
19 A. -- and them being mean to her and all these  
20 things, but then when we're in the office, it was like  
21 nothing. And they had -- you know, she was nice to them  
22 and they interacted fine.  
23 Q. Did you ever see Anabel be mean to Sandy?  
24 A. I didn't see.  
25 Q. Did you ever see Maribel be mean to Sandy?

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1 A. No.  
2 Q. Okay. So you -- did you ever see Sandy -- let  
3 me rephrase the question.  
4 Did you ever see Anabel do anything that you  
5 thought was inappropriate towards Sandy?  
6 A. No.  
7 Q. Yell at her?  
8 A. No.  
9 Q. Talk down at her?  
10 A. No.  
11 Q. Did you ever see her do that to Maribel?  
12 A. No.  
13 Q. When you were with Anabel, did you think that  
14 Anabel was stupid?  
15 A. No.  
16 Q. When you were with Maribel, did you think she  
17 was stupid?  
18 A. No. I don't judge people like that.  
19 Q. All right. That's fine, but you can assess  
20 whether or not they can understand what you're talking  
21 about, right?  
22 A. Yeah.  
23 Q. If you -- if you talk about something and they  
24 don't quite understand what you're talking about, you  
25 can kind of say, well, this person is on a different

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1 planet?  
2 A. Yeah.  
3 Q. Okay. You didn't see that with Anabel, did  
4 you?  
5 A. No.  
6 Q. You didn't see that with Maribel?  
7 A. No.  
8 Q. Okay. And then when you were interacting with  
9 Anabel, did you ever come to the conclusion that she was  
10 fake?  
11 A. Sometimes, yeah.  
12 Q. Tell me what she did that you thought was  
13 fake.  
14 A. She did talk about herself a lot.  
15 Q. Okay. Did that mean to you that she was fake?  
16 A. That she was very into her- -- herself.  
17 Q. Did she ever say something to you that was  
18 untrue?  
19 A. While I was working there?  
20 Q. Yes.  
21 MR. FOUR: Objection, calls for speculation.  
22 THE WITNESS: Yeah, I don't know.  
23 BY MR. CORRALES:  
24 Q. Okay. Well, did you ever see -- did you  
25 ever -- did she ever say anything to you that you later

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1 found to be untrue while you were working there -- while  
2 she was working there?  
3 A. While she was working there.  
4 MR. FOUR: And you're asking about Anabel?  
5 MR. CORRALES: Yes, Anabel.  
6 THE WITNESS: Yes.  
7 BY MR. CORRALES:  
8 Q. What is it?  
9 A. When I asked her in regards to Isabel or just  
10 everything that was happening, Anabel said, "It's all  
11 true." And then when I asked her what about the quid  
12 pro quo, she didn't know what quid pro quo was and then  
13 she told me that she didn't know anything about Isabel.  
14 Q. Okay. Let's -- that aside --  
15 A. Okay. That was while she was working there.  
16 Q. -- with respect to the interactions outside  
17 the -- when the lawsuits came down --  
18 A. Okay.  
19 Q. -- when you were working with her on a daily  
20 basis, interacting with her --  
21 A. Yeah.  
22 Q. -- did she ever say anything that you thought  
23 was -- that you later found out to be untrue?  
24 A. No, and I didn't work with her on a daily  
25 basis.

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1 Q. Okay. But at the same time, did she ever say  
2 to you, you know, I went on vacation and I drove a Rolls  
3 Royce and you found out, you know --  
4 A. No.  
5 Q. -- she didn't drive a Rolls Royce, that's kind  
6 of fake?  
7 A. No.  
8 Q. She never did anything like that to you,  
9 right?  
10 A. No.  
11 Q. And did you ever hear Anabel talk bad about  
12 Sandy?  
13 A. No.  
14 Q. Did you ever hear Maribel talk bad about  
15 Sandy?  
16 A. No.  
17 Q. So let's talk about the time that you found  
18 out about these lawsuits.  
19 A. Yes.  
20 Q. Sandy's lawsuit and Isabel's lawsuits.  
21 A. Yes.  
22 Q. Okay. So which one did you find out about  
23 first?  
24 A. Sandy's.  
25 Q. Okay. How did that happen?

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1 A. I believe it was on the news.  
2 Q. You found out when you saw the news?  
3 A. Yeah, we might have had a staff meeting first.  
4 Q. Okay.  
5 A. Yes.  
6 Q. So what did you -- what do you remember about  
7 the staff meeting?  
8 A. That we were told that Sandy was going to file  
9 a lawsuit.  
10 Q. Going to file?  
11 A. Yes. We heard that it got leaked to the media  
12 first before she filed -- before she even filed.  
13 Q. Okay. And who told you this?  
14 A. I don't remember.  
15 Q. You said it was at a staff meeting. Who ran  
16 the staff meeting?  
17 A. Mickey.  
18 Q. So who would have spoken up about that?  
19 A. It was probably Mickey.  
20 Q. Okay.  
21 A. Yeah.  
22 Q. And what to your knowledge did -- what to your  
23 knowledge did he say at that meeting about the lawsuit?  
24 A. Exactly what I just told you. That Sandy was  
25 going to file a lawsuit. She hadn't yet, but it had

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1 been leaked to the media.  
2 Q. Okay, all right. And did you at sometime  
3 actually learn about the lawsuit after it was filed?  
4 A. Yes.  
5 Q. How?  
6 A. I looked it up.  
7 Q. How did you look it up?  
8 A. I went to the court website.  
9 Q. Okay.  
10 A. I don't remember exactly what court website.  
11 Q. Did you look it up based upon your training at  
12 law school?  
13 A. Based on that, yeah, and my research  
14 background, yes.  
15 Q. And you found it?  
16 A. Yes.  
17 Q. Okay. How did you know that it had been  
18 filed?  
19 A. Because -- I don't know. I think I was  
20 checking if it had been filed --  
21 Q. Okay.  
22 A. -- and I looked and it was there.  
23 Q. You're monitoring on a daily basis?  
24 A. I wouldn't say daily basis, no.  
25 Q. On a regular basis?

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1 A. No.  
2 Q. Monitoring how many times?  
3 A. I checked that one time and it was there.  
4 Q. Okay. Did anybody ask you to check?  
5 A. No.  
6 Q. You did this on your own?  
7 A. Yes.  
8 Q. Why?  
9 A. Because I wanted to know what was happening.  
10 I --  
11 Q. Other than wanting to know what was happening,  
12 I'm assuming that you were just curious?  
13 A. Yes.  
14 Q. Other than being curious, any other reason why  
15 you checked to see whether Sandy filed her lawsuit?  
16 A. No.  
17 Q. So you did this on your personal time?  
18 A. Yes.  
19 Q. And when you saw the lawsuit, did you download  
20 it?  
21 A. Yes, I had to pay for it. I think it was like  
22 \$2.  
23 Q. Okay. How soon after Sandy filed her lawsuit  
24 did Isabel file her lawsuit?  
25 A. I'm not sure.

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1 MR. FOUR: If you know.  
2 THE WITNESS: I'm not sure.  
3 BY MR. CORRALES:  
4 Q. Did you look up Isabel's lawsuit?  
5 A. Yes.  
6 Q. So when did you do that?  
7 A. After she filed it.  
8 Q. How soon after?  
9 A. I'm not sure.  
10 Q. Almost immediately or close --  
11 A. Close.  
12 Q. -- close in time?  
13 A. Close.  
14 Q. Okay. And then do you remember how -- how  
15 long that was after Sandy filed her lawsuit?  
16 A. No, I don't remember. It was --  
17 Q. A few weeks? A couple weeks?  
18 A. I don't remember.  
19 Q. Close in time? Same month?  
20 A. I would be guessing, but I would think --  
21 MR. FOUR: Don't guess. Don't guess.  
22 BY MR. CORRALES:  
23 Q. Give me your best estimate. Was it -- best  
24 recollection, was it the same month?  
25 A. I want to say it was the same month.

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1 Q. Okay. So was this like in December of 2016,  
2 the end of the year sometime?  
3 A. Sandy was suspended and terminated in  
4 December.  
5 Q. Okay.  
6 A. So I'm not sure if Isabel's was in January or  
7 not.  
8 Q. All right.  
9 A. I believe Isabel's (inaudible) in the new  
10 year, but I'm not sure.  
11 THE COURT REPORTER: I'm sorry, was or was not?  
12 THE WITNESS: I believe Isabel's was in the new  
13 year.  
14 BY MR. CORRALES:  
15 Q. Okay. All right. So when you -- when you  
16 looked at Isabel's lawsuit --  
17 A. Yes.  
18 Q. -- did you also download that as well?  
19 A. Yes.  
20 Q. Now, when you downloaded both of these  
21 lawsuits, did you copy them onto your computer in a PDF  
22 format?  
23 A. Yes.  
24 Q. Okay.  
25 A. That's how they were downloaded in PDF.

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1 Q. So they were downloaded in --  
2 A. In PDF.  
3 Q. -- in PDF format --  
4 A. Yes.  
5 Q. -- and so you -- did you keep that in a file  
6 in your computer?  
7 A. I don't know if it was in a file, but it was  
8 probably on my desktop.  
9 Q. Okay. So you just didn't download it and lose  
10 it, you had it on your -- in your computer?  
11 A. Yes, yeah.  
12 Q. So if somebody said to you, can you e-mail me  
13 that document, you could have done that?  
14 A. Yes.  
15 Q. All right. And so after you filed -- excuse  
16 me -- after you downloaded both lawsuits --  
17 A. Yes.  
18 Q. -- was Anabel still working?  
19 A. Yes.  
20 Q. Okay. Did you tell Anabel about any of these  
21 lawsuits?  
22 A. Yes.  
23 Q. How?  
24 A. I called her I believe with Sandy's and I  
25 called her with Isabel as well. And then we also

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1 communicated on Facebook.  
2 Q. Okay. You --  
3 A. And I'm not sure if I called her or if I  
4 Facebook messaged her first.  
5 Q. Okay. So you called Anabel on both lawsuits  
6 or just one of them?  
7 A. Yeah, maybe I text messaged. I either texted  
8 or called her.  
9 Q. Okay. And did you -- did you at any time send  
10 her through the PDF --  
11 A. Yes.  
12 Q. -- document the lawsuits?  
13 A. Yes.  
14 Q. Okay. On both?  
15 A. I believe I only sent her Isabel's.  
16 Q. Okay.  
17 A. From what I remember.  
18 Q. All right, okay. Now, when you sent Isabel's  
19 lawsuit to Anabel --  
20 A. Uh-huh.  
21 Q. -- what, if anything, did you say in the  
22 e-mail?  
23 A. I asked her if she --  
24 MR. FOUR: Objection, assumes facts not in evidence  
25 that that was an e-mail.

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1 Go ahead. You can answer.  
2 THE WITNESS: It wasn't e-mail.  
3 BY MR. CORRALES:  
4 Q. It wasn't?  
5 A. I don't believe we e-mailed. I believe it was  
6 all over Facebook messenger.  
7 Q. All right, okay. What, if anything, did you  
8 say to her when you sent her the complaints?  
9 A. I asked her if she knew anything, if she knew  
10 it was true.  
11 Q. Asked if she -- words to the effect, do you  
12 know if this is true?  
13 A. Yes.  
14 Q. And what, if anything, did she say in  
15 response?  
16 A. She said it's all true and then I asked what  
17 about the quid pro quo.  
18 Q. Okay. And --  
19 A. And then she said, "What's quid pro quo?"  
20 Q. Okay. And then what did you say?  
21 A. And then I explained it's when you do a favor  
22 for something in return.  
23 Q. Okay. Again, based upon your legal training  
24 you understood that?  
25 A. I knew what quid pro quo was.

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1 Q. And then when you said that to her, did she  
2 understand what it was?  
3 A. Yes.  
4 Q. Okay.  
5 A. And then she said she didn't know anything  
6 about Isabel.  
7 Q. She didn't know anything about that quid --  
8 A. Isabel's quid pro quo.  
9 Q. -- pro quo claim?  
10 A. Yes. Yes.  
11 Q. All right. What did you understand her to  
12 mean when she said "it's all true"?  
13 A. I didn't know. That's why I --  
14 Q. Did she --  
15 A. -- followed up with a question.  
16 Q. Did she -- was this all communicated via  
17 electronic means?  
18 A. Yes.  
19 Q. Okay.  
20 A. Yes.  
21 Q. And so did she say anything to you in this  
22 electronic communication, whether it's e-mail or  
23 Facebook --  
24 A. Uh-huh.  
25 Q. -- that she was going to support Isabel?

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1 A. No.  
2 Q. Did she ever say that to you on the phone?  
3 A. No.  
4 Q. Did you ever -- did you ever say to Isabel  
5 that you thought this might be true?  
6 A. You mean Anabel?  
7 Q. I'm sorry, Anabel, Anabel, that you thought  
8 this might be true?  
9 A. No, that's why I was asking.  
10 Q. Okay. And now, did you ask Anabel if she  
11 thought that either Sandy or Isabel were saying the  
12 truth about what they were alleging in their complaint?  
13 A. I just asked her about Isabel.  
14 Q. Okay. Did you ask her if she thought that  
15 Isabel was saying the truth about what she said in her  
16 complaint?  
17 A. No, all I asked her was if -- what I just told  
18 you.  
19 Q. Okay. And you're saying that Isabel [sic] did  
20 not say anything to the effect that she thought that  
21 Isabel was saying the truth about what she was alleging  
22 in her complaint?  
23 MR. FOUR: You misspoke. You began by saying  
24 Isabel. Do you mean Anabel?  
25 MR. CORRALES: Anabel, yeah, I'm sorry.

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1 BY MR. CORRALES:  
2 Q. Anabel didn't say anything about she thought  
3 that Isabel was saying the truth?  
4 A. No.  
5 Q. Okay. That topic never came up?  
6 A. No.  
7 Q. Either in phone or text messages --  
8 A. No.  
9 Q. -- or electronic messages?  
10 All right. Did you ever say to her in your  
11 communications with -- I'm talking about Anabel --  
12 A. Yes.  
13 Q. -- words to the effect, We owe Mickey a lot  
14 and we should be loyal?  
15 A. No.  
16 Q. Did you ever tell Anabel that -- that you or  
17 anyone associated with Local 135 should be loyal to  
18 Mickey --  
19 A. No.  
20 Q. -- in light of these lawsuits?  
21 A. No.  
22 Q. Did you ever tell Anabel or anyone at  
23 Local 135 that they should support Mickey in his  
24 lawsuits?  
25 A. No.

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1 Q. Okay. Did you believe Sandy was saying  
2 anything untruthful in her complaint when you read it?  
3 A. Yes.  
4 MR. FOUR: Objection --  
5 BY MR. CORRALES:  
6 Q. What did you --  
7 MR. FOUR: -- calls for speculation.  
8 You can answer.  
9 BY MR. CORRALES:  
10 Q. What did you believe she was saying that was  
11 untruthful in her complaint?  
12 A. That she was discriminated against by gender.  
13 Q. Okay. Anything else?  
14 A. That she was fired unjustly.  
15 Q. Okay. Anything else?  
16 A. What else? Not that I can recall.  
17 Q. Okay. So why do you believe it was an untrue  
18 statement for her to say that she was discriminated  
19 against?  
20 A. By gender?  
21 Q. By gender, uh-huh.  
22 A. Because from my perspective and my experience  
23 Mickey Kasparian treated his female organizers very  
24 well. He treated me very well as far as advancing our  
25 careers and lifting us up and supporting us.

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1 Q. Did you ever hear Mickey use foul language in  
2 front of women at the workplace?  
3 A. No.  
4 MR. FOUR: Objection, vague as to "foul language."  
5 BY MR. CORRALES:  
6 Q. Foul language. Do you understand what foul  
7 language means?  
8 A. Yes.  
9 Q. Vulgar language?  
10 A. Yes.  
11 Q. "F" word --  
12 A. I've heard --  
13 Q. Referring to women's body parts?  
14 A. No.  
15 MR. FOUR: Objection --  
16 BY MR. CORRALES:  
17 Q. That's what I mean --  
18 MR. CORRALES: I'm sorry. Can I finish?  
19 BY MR. CORRALES:  
20 Q. That's what I mean when I say foul language.  
21 A. Okay.  
22 MR. FOUR: Okay. Just objection, compound. You  
23 asked now --  
24 THE WITNESS: Do you want to ask me --  
25 BY MR. CORRALES:

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1 Q. Yes. Did you ever hear -- based upon that  
2 definition, did you ever hear him use foul language?  
3 A. I have heard him say the word "fuck." I have  
4 not heard him say anything about women's body parts.  
5 Q. You never heard him say anything about women  
6 politicians' body parts?  
7 A. No.  
8 Q. Or anything to the effect that this woman  
9 politician got where she was because of her tits --  
10 A. No.  
11 Q. -- or words to that effect?  
12 A. No.  
13 Q. Okay. And if you heard that, you would be  
14 offended, correct?  
15 A. Yes.  
16 Q. Okay. Did you ever hear that Mickey had  
17 groped or sexually assaulted other women while you were  
18 working there?  
19 A. No.  
20 Q. Have you heard that today?  
21 A. Yes.  
22 Q. What have you heard?  
23 A. Through the lawsuits.  
24 MR. FOUR: Well, hold on one second. Objection,  
25 vague as to "today." Do you literally mean today in



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1 this deposition --  
2 MR. CORRALES: Yes.  
3 MR. FOUR: -- or in today's general time frame.  
4 MR. CORRALES: Today is today.  
5 BY MR. CORRALES:  
6 Q. You've heard that?  
7 A. Yes, through Isabel Vasquez --  
8 MR. FOUR: Did you hear -- understand what his  
9 question was?  
10 THE WITNESS: No.  
11 MR. FOUR: He's asking now, did you hear today,  
12 literally today, December 13th --  
13 THE WITNESS: Oh.  
14 MR. FOUR: -- about groping or a sexual assault.  
15 MR. CORRALES: No, that's not what I said.  
16 MR. FOUR: That's what I thought you said.  
17 MR. CORRALES: No, you're misinterpreting what I  
18 said.  
19 MR. FOUR: That was not intentionally. That's what  
20 my objection was. I objected --  
21 MR. CORRALES: Well, how would that even be  
22 logical?  
23 BY MR. CORRALES:  
24 Q. As of today, have you heard Mickey -- heard  
25 that Mickey had groped or assaulted -- sexually

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1 assaulted someone?  
2 MR. FOUR: That is a different question.  
3 You can answer that.  
4 MR. CORRALES: That's the same question.  
5 BY MR. CORRALES:  
6 Q. Go ahead and answer.  
7 A. Yes.  
8 Q. Okay. What did you hear?  
9 A. Isabel's lawsuit. Through Isabel's lawsuit  
10 she alleged that Mickey did.  
11 Q. Okay. Other than that, have you heard  
12 anything else?  
13 A. No.  
14 Q. Have you heard, for example, that Melody  
15 Gudenus had claimed that he groped her?  
16 A. No.  
17 Q. Do you know Melody Gudenus?  
18 A. I do.  
19 Q. How do you know her?  
20 A. I know her through the labor movement.  
21 Q. Okay. And do you believe that -- well, you  
22 interacted with her?  
23 A. Yes.  
24 Q. Have you been told about what she said in her  
25 deposition?

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1 A. No.  
2 Q. Did you understand that she said in her  
3 deposition recently that Mickey had groped her in the  
4 vagina and in her breast?  
5 A. Do I understand that?  
6 Q. Did you hear that?  
7 A. No.  
8 Q. Did you ever hear that she had testified that  
9 Mickey had called her on the phone and was masturbating  
10 on the phone when he spoke to her?  
11 A. No.  
12 Q. Didn't hear that?  
13 A. No.  
14 Q. Did you ever hear that Mickey had had her and  
15 Monica Bonilla and another woman come to hotel and ask  
16 for a foursome?  
17 A. No.  
18 Q. And you never heard that Melody Gudenus had  
19 testified about that?  
20 A. No.  
21 Q. Okay. And if you heard that that was true --  
22 A. Uh-huh.  
23 Q. -- would that be something that you would  
24 object to, behavior by Mickey Kasparian?  
25 MR. FOUR: Objection, calls for speculation. It's

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1 a false hypothetical and it's an incomplete  
2 hypothetical.  
3 MR. CORRALES: You can answer.  
4 MR. FOUR: You don't have to answer it.  
5 THE WITNESS: Okay.  
6 BY MR. CORRALES:  
7 Q. Is that the kind of behavior that you would  
8 object to if you heard that Mickey had done that in the  
9 workplace?  
10 MR. FOUR: Same objection. Because it's an  
11 incomplete hypothetical, she can't answer that question.  
12 MR. CORRALES: I think she can and I'm going to ask  
13 it again and if I don't get an answer, we're going to  
14 come right back after we go to court and talk to the  
15 judge.  
16 BY MR. CORRALES:  
17 Q. If you heard that Mickey had groped another  
18 woman in the workplace, would you object to that?  
19 THE WITNESS: Should I answer or not?  
20 MR. FOUR: You can go ahead, to the degree you can  
21 answer it.  
22 THE WITNESS: Yes.  
23 BY MR. CORRALES:  
24 Q. And if you heard that he had propositioned  
25 another woman in the workplace to have a foursome, would

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1 you object to that?  
2 A. Yes.  
3 Q. And if you heard that he had called an  
4 employee on the phone and masturbated on the phone,  
5 would you object to that -- would you object to that  
6 workplace behavior?  
7 MR. FOUR: All of these questions I have the same  
8 objection for. They are incomplete hypotheticals, they  
9 call for a conclusion and they call for speculation.  
10 BY MR. CORRALES:  
11 Q. You can answer.  
12 A. Yes.  
13 Q. Okay. Now, did you ever tell Sandy or express  
14 support for Sandy at a Democratic Party delegate  
15 election in January of 2017?  
16 A. Yes.  
17 Q. Okay. And this was after you heard about her  
18 lawsuit?  
19 A. Yes.  
20 Q. After you -- you felt that what she was saying  
21 was untrue in her lawsuit, correct?  
22 A. Yes, uh-huh.  
23 Q. Okay. Why did you support her in her  
24 democratic delegate election in January of 2017?  
25 A. So it wasn't so much -- it was definitely not

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1 support of her lawsuit, but I don't even remember what I  
2 said, but I said basically that people should be able to  
3 support whoever, even if it's Sandy or me. It was an  
4 election. So I went up there and made a speech and I  
5 did say something to the effect of, If you want to  
6 support Sandy, support Sandy. I don't remember exactly  
7 what I said.  
8 Q. Did you say, If you want to support her,  
9 support her, or did you actually express support for  
10 Sandy?  
11 A. No.  
12 Q. What did -- "no" to what?  
13 A. I did not express support for her.  
14 Q. So why did you get up and talk?  
15 A. Because I had to. They made us give speeches.  
16 Q. Who forced you -- who forced you to talk?  
17 A. It was the nature of the event. So if you are  
18 running, you give a speech telling people why they  
19 should vote for you.  
20 Q. So you got up and you said to everyone, "You  
21 don't have to vote for Sandy," is that what you said?  
22 A. No.  
23 Q. What did you say when you got up?  
24 A. I don't remember. I don't remember exactly  
25 what I said.

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1 Q. Would you have gone up on the podium and said  
2 don't vote for Sandy?  
3 A. No.  
4 Q. So when you got up on the podium, you got up  
5 on the podium to express support for Sandy, correct?  
6 A. Among other things that I said.  
7 Q. Among other things --  
8 A. Yeah.  
9 Q. -- but that was one of the things that you  
10 did?  
11 A. Yes, but I don't remember in what context it  
12 was.  
13 Q. All right. But people who attended that --  
14 A. Yeah.  
15 Q. -- would remember what you said, correct?  
16 A. Yeah, maybe they would.  
17 Q. So if we talked to people that were there and  
18 asked them what you said --  
19 A. Yeah.  
20 Q. -- they would remember what you said, correct?  
21 A. Yeah.  
22 Q. And they would remember that you said that you  
23 expressed support for Sandy, correct?  
24 A. Yeah.  
25 Q. All right. Now, why did you express support

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1 for Sandy if you thought that she was lying in her  
2 complaint?  
3 MR. FOUR: Objection, asked and answered.  
4 Go ahead.  
5 THE WITNESS: I ju- -- I think they were two  
6 separate issues.  
7 BY MR. CORRALES:  
8 Q. How were they separate?  
9 A. Because at that time -- well, first of all,  
10 Sandy -- there is a back story to it. So there was a  
11 slate that both me and Sandy were on for the labor  
12 council and we were all on that slate and I was -- I  
13 believe now that I was expressing support of the entire  
14 slate --  
15 Q. Okay.  
16 A. -- including Sandy --  
17 Q. Okay.  
18 A. -- and I believe that's what I said is that  
19 you should support this entire slate, including Sandy.  
20 Q. Okay, all right.  
21 A. Yes.  
22 Q. Back to the question.  
23 A. Yes.  
24 Q. Do you remember the question?  
25 A. What did I -- why would I support -- why I

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1 would express support if I thought she was lying --  
2 Q. That's the question.  
3 A. -- in her deposition. I don't know.  
4 Q. Was it because you were scared to lose your  
5 job?  
6 A. No.  
7 Q. Did you believe that if you -- if you didn't  
8 say that Sandy was lying that you would be unloyal [sic]  
9 to Mickey?  
10 A. I didn't say I was -- I'm sorry, can you  
11 repeat that?  
12 Q. All right. You said that you thought that  
13 Sandy's complaint --  
14 A. Yes.  
15 Q. -- was untrue --  
16 A. Yes.  
17 Q. -- in certain respects.  
18 A. Yes.  
19 Q. Is it correct that you said that because you  
20 wanted to be loyal to Mickey?  
21 A. No.  
22 Q. You said that because you were afraid to lose  
23 your job?  
24 A. No.  
25 Q. All right. Did you also -- you also said

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1 that -- well, I don't think I asked you this.  
2 Did you also believe that Isabel was lying in  
3 her complaint when you read it?  
4 A. I didn't know.  
5 Q. Okay. Did you ever tell anybody that?  
6 A. That I didn't know?  
7 Q. That you -- no, that you thought that she was  
8 lying.  
9 A. No.  
10 Q. Did you ever read Isabel's complaint?  
11 A. Yes.  
12 Q. When?  
13 A. I think we discussed it earlier.  
14 Q. I mean Anabel, I'm sorry.  
15 A. Yes, after she filed it.  
16 Q. All right. When was that?  
17 A. I don't remember when she filed it.  
18 Q. How did you happen to see it? Same way?  
19 A. Same way.  
20 Q. Okay.  
21 A. Same exact way.  
22 Q. Okay. And you read it?  
23 A. Yes.  
24 Q. And did you see anything in there that you  
25 thought was untrue?

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1 A. Yes.  
2 Q. What?  
3 A. Multiple things.  
4 Q. What things?  
5 A. Particularly -- well, a lot. So what was  
6 untrue about me was that she assumed and I -- even the  
7 way that it was written it was an assumption that Mickey  
8 had asked me to call her and he didn't, so that was  
9 untrue. That I had unbiased loyalty toward Mickey.  
10 That she was demoted, which I did not believe was true.  
11 Q. Okay.  
12 A. That she was fired without cause, which I did  
13 not believe was true.  
14 Q. Okay. Anything else?  
15 A. Without looking at it, that's all I can  
16 remember right now.  
17 Q. Okay. When you say that she was demoted  
18 and --  
19 A. Yes.  
20 Q. -- you didn't think that was true --  
21 A. Uh-huh.  
22 Q. -- you weren't her supervisor, were you?  
23 A. No.  
24 Q. You were, in fact, just a union rep?  
25 A. Yes.

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1 Q. Didn't work with her as a union organizer,  
2 correct?  
3 A. Yes.  
4 Q. So how was it that you would conclude that she  
5 wasn't demoted?  
6 A. Because she was still an organizer and from my  
7 perspective -- again, I'm not her supervisor, she  
8 wasn't -- her pay stayed the same and she was still an  
9 organizer.  
10 Q. Who told you that her pay stayed the same?  
11 A. I don't remember.  
12 Q. How would you know that her pay stayed the  
13 same unless you inquired?  
14 A. I did inquire.  
15 Q. Okay. Why would you inquire about her pay?  
16 A. Because I was wondering if she actually got  
17 demoted.  
18 Q. Okay. So were you on an assignment to  
19 determine --  
20 A. No --  
21 Q. -- if she got demoted?  
22 A. -- just curious.  
23 Q. So did you think that that was something that  
24 was a private -- privacy matter that you --  
25 A. No.

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1 Q. -- that you were entitled to inquire into?  
2 A. No.  
3 Q. Who did you ask about that?  
4 A. I don't remember.  
5 Q. Human resources or is there a human resources?  
6 A. We don't have human resources.  
7 Q. So did you go to the accounting department and  
8 ask somebody?  
9 A. No.  
10 Q. Did you ask --  
11 A. -- I definitely didn't ask --  
12 Q. -- Mickey?  
13 A. No.  
14 Q. So how did you acquire this private  
15 information of a former employee concerning whether or  
16 not she had a pay increase?  
17 A. I don't remember.  
18 MR. FOUR: Objection, misstates testimony that  
19 it -- it misstates testimony and assumes facts not in  
20 evidence that it's private information.  
21 BY MR. CORRALES:  
22 Q. How did you get that information?  
23 A. I don't remember.  
24 Q. Was it just rumor then?  
25 A. Maybe.

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1 Q. So if it was rumor, then you don't really know  
2 if she was demoted?  
3 A. No, it was a belief.  
4 Q. Okay. So it was --  
5 A. I did not believe that she was demoted.  
6 Q. Okay. So you didn't really know?  
7 A. No.  
8 Q. Okay. So you said that it was untrue that she  
9 was fired without cause?  
10 A. Yeah.  
11 Q. Okay. So what's that based on?  
12 A. She was creating a hostile work environment at  
13 the office.  
14 Q. Okay. Now, again, you weren't her  
15 supervisor --  
16 A. No.  
17 Q. -- right? You didn't make any decision as to  
18 whether or not she should be fired --  
19 A. No.  
20 Q. -- correct? And you were not an organizer?  
21 A. No.  
22 Q. So you didn't know whether or not she was  
23 doing her duties as an organizer since you were not an  
24 organizer at the time, correct?  
25 A. I did know she wasn't doing her duties because

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1 she said to one of my coworkers, "I'm online shopping  
2 all day."  
3 Q. Okay. Other than that, okay, did you have any  
4 kind of supervisory responsibility over her?  
5 A. No.  
6 Q. Did you report to anyone that she was online  
7 shopping when she was supposed to be working?  
8 A. No.  
9 Q. And did you understand why she said that?  
10 A. No.  
11 Q. Did you know that, for example, no one was  
12 giving her work and so she had nothing else better to  
13 do?  
14 MR. FOUR: Objection, assumes facts not in  
15 evidence.  
16 You can answer.  
17 THE WITNESS: No --  
18 BY MR. CORRALES:  
19 Q. No? Okay.  
20 A. -- but I would think that you'd be able to  
21 find one to do.  
22 Q. There's no but. There's no but.  
23 A. Yeah.  
24 Q. I just asked a "yes" or "no" question.  
25 MR. FOUR: Did you answer -- were you still

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1 answering the question?  
2 THE WITNESS: Yes.  
3 MR. FOUR: Then let the witness finish her answer.  
4 Go on.  
5 BY MR. CORRALES:  
6 Q. Did you understand that I asked you a "yes" or  
7 "no" question?  
8 A. Yes.  
9 Q. Did you answer the question with a "yes" or a  
10 "no"?  
11 A. I'm sorry, can you repeat the question?  
12 MR. CORRALES: Madam Court Reporter, can you repeat  
13 the question? It's a "yes" or "no" question.  
14 (Record read as requested.)  
15 THE WITNESS: Did I know that? No.  
16 BY MR. CORRALES:  
17 Q. Okay. Had you known that she was isolated, no  
18 one was giving her assignments and that she didn't --  
19 had nothing to do during the day, would that have  
20 affected your belief that she was online shopping  
21 contrary to whatever rules you understood existed?  
22 MR. FOUR: Objection, assumes facts not in  
23 evidence, calls for speculation.  
24 BY MR. CORRALES:  
25 Q. You can answer.

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1 A. No.  
2 Q. "No"?  
3 A. No.  
4 Q. Was there a rule that was in place that said  
5 people should not online shop during working hours?  
6 A. No, I don't know if there's a written policy.  
7 Q. "Yes" or "no"? You said "no."  
8 MR. FOUR: The witness can answer the question.  
9 Go ahead and answer the question.  
10 MR. CORRALES: No, she's not answering the  
11 question.  
12 MR. FOUR: No --  
13 BY MR. CORRALES:  
14 Q. Now, I didn't ask you why. You said "no,"  
15 right?  
16 MR. FOUR: The witness can answer the question --  
17 BY MR. CORRALES:  
18 Q. You answered the question "no," is that  
19 correct?  
20 A. I think it was an assumed policy that you  
21 don't online shop at work.  
22 Q. Okay. Now, I didn't ask you that. I said --  
23 I said "yes" or "no" and you said --  
24 A. I don't know.  
25 Q. You don't know. Okay.

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1 A. I don't know.  
2 Q. And if you were to say you think it was an  
3 assumed policy, you would be guessing, correct?  
4 A. Yes.  
5 Q. So you don't know?  
6 A. I don't know.  
7 Q. All right. All right. So did -- you said  
8 that it was untrue that you asked her -- it was untrue  
9 that you had unbiased loyalty to Kasparian?  
10 A. Yes.  
11 Q. As she alleged in her complaint?  
12 A. Yes.  
13 Q. Okay. Why do you believe that's untrue?  
14 A. Because I do not have unbiased loyalty to  
15 Mickey Kasparian.  
16 Q. Okay. Did -- did you ever contact a person by  
17 the name of Nate Fairman?  
18 A. Yes.  
19 Q. Who is Nate Fairman?  
20 A. He was my friend and he's a business manager  
21 at IBW.  
22 Q. When was the last time you contacted him?  
23 A. Maybe a month or two ago.  
24 Q. Okay. And did you understand that Nate  
25 Fairman is Anabel's boss?

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1 A. Yes.  
2 Q. And what was the purpose for contacting Nate  
3 Fairman?  
4 A. I let him know that, first of all -- well, it  
5 depends, because I contacted him a couple times, but I  
6 think the most recent time -- what did I say to him? It  
7 was something Anabel was doing that was disturbing and  
8 --  
9 Q. Okay. So --  
10 A. -- I let him know about it.  
11 Q. Okay. So -- so you contacted him because of  
12 what Anabel was doing that was disturbing --  
13 A. Yes.  
14 Q. -- even though Anabel no longer works at Local  
15 135?  
16 A. Yes.  
17 Q. And you wanted her current employer to know  
18 about what you thought Anabel was doing that was  
19 disturbing?  
20 A. I wasn't contacting him as her employer, I was  
21 contacting him as my friend.  
22 Q. Okay. But you knew that he was her  
23 supervisor?  
24 A. Yes.  
25 Q. You knew that if you said something negative

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1 about Anabel that that might affect his relationship  
2 with her as an employer/employee?  
3 A. No, I didn't know that.  
4 Q. Okay. But you -- had you ever heard of anyone  
5 contacting someone's employer to badmouth them?  
6 MR. FOUR: Objection, relevance, argu- --  
7 BY MR. CORRALES:  
8 Q. Did you ever hear of that?  
9 MR. FOUR: Objection, argumentative.  
10 THE WITNESS: I've heard of that, yes.  
11 BY MR. CORRALES:  
12 Q. Okay. And did you think that if someone  
13 contacted an employer to badmouth an employee that that  
14 would have an effect upon the employer relationship?  
15 A. It depends.  
16 MR. FOUR: Objection, argu- --  
17 BY MR. CORRALES:  
18 Q. Okay.  
19 MR. FOUR: Hold on. For the record, it's  
20 argumentative, calls for specula- --  
21 MR. CORRALES: All right.  
22 MR. FOUR: -- -tion, it's an incomplete  
23 hypothetical.  
24 Counsel, you have to let me -- you object if I  
25 interrupt you.

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1 MR. CORRALES: I'm not interrupting you.  
 2 MR. FOUR: You have to let me -- you were saying --  
 3 MR. CORRALES: I'm not interrupting.  
 4 MR. FOUR: -- "all right" in the middle of my  
 5 objection and you're objecting now.  
 6 MR. CORRALES: Keep going. Keep going.  
 7 MR. FOUR: I have a right to state my objection --  
 8 MR. CORRALES: I'm not interrupting.  
 9 MR. FOUR: -- for the record. But you're  
 10 interrupting me right now.  
 11 MR. CORRALES: I thought you were -- keep going.  
 12 MR. FOUR: I won't go until you stop talking.  
 13 MR. CORRALES: Are you done?  
 14 MR. FOUR: No.  
 15 MR. CORRALES: Keep going.  
 16 MR. FOUR: Okay. I'm going to complete my  
 17 objections.  
 18 MR. CORRALES: Please.  
 19 MR. FOUR: Okay. It assumes facts not in evidence,  
 20 calls for speculation, incomplete hypothetical and it's  
 21 argumentative like this entire line of questioning has  
 22 been.  
 23 Go on.  
 24 BY MR. CORRALES:  
 25 Q. All right, okay. Now, so did you ever reach

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1 out to or talk -- contact Nate Fairman and ask for a  
 2 meeting with him with Richard Barrera?  
 3 A. Yes.  
 4 Q. Okay. Why would you do that?  
 5 A. Because I wanted Richard and Mic- - -and Nate  
 6 to meet.  
 7 Q. For what purpose?  
 8 A. Because I felt that there was a division in  
 9 the labor movement and I wanted him to talk to Richard.  
 10 Richard actually used to be one of Nate's mentors, so I  
 11 was trying to bridge that relationship.  
 12 Q. And you wanted to talk to him --  
 13 A. Yes.  
 14 Q. -- Nate Fairman --  
 15 A. Yes.  
 16 Q. -- with -- with Mr. Barrera --  
 17 A. Yes.  
 18 Q. -- about Anabel?  
 19 A. No.  
 20 Q. Oh, so Anabel -- the topic of Anabel would not  
 21 have come up?  
 22 A. When I set up that meeting with Nate and  
 23 Richard, she was still employed at the local. So no, I  
 24 did not set up that meeting to talk about Anabel.  
 25 Q. Did you ever set up the meeting -- did you

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1 ever set up a meeting after she left?  
 2 A. No.  
 3 Q. Did you ever try to set up a meeting --  
 4 A. No.  
 5 Q. -- after she left?  
 6 A. No.  
 7 Q. So when you set up a meeting with -- or tried  
 8 to set up a meeting with Nate --  
 9 A. Yes.  
 10 Q. -- before Anabel left --  
 11 A. Yes.  
 12 Q. -- was it after the Vasquez and Naranjo --  
 13 A. Yes.  
 14 Q. -- lawsuits were filed?  
 15 A. Yes.  
 16 Q. And the reason why you contacted Nate --  
 17 A. Yes.  
 18 Q. -- to meet with him --  
 19 A. Yes.  
 20 Q. -- with Barrera --  
 21 A. Yes.  
 22 Q. -- was to seek his support for Mickey,  
 23 correct?  
 24 A. No.  
 25 Q. What other reason would there have been?

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1 A. I already told you.  
 2 Q. I don't believe you did. What is it?  
 3 A. I told you that it was to repair the  
 4 relationship with Richard and Nate and going forward  
 5 repair what was happening in the labor movement.  
 6 Q. Okay. What kind of relationship needed to be  
 7 repaired?  
 8 A. I already told you, that Nate was -- Richard  
 9 used to be one of Nate's mentors.  
 10 Q. Okay. I'm not really following you. How  
 11 was -- how was their relationship in need of repair?  
 12 What was going on?  
 13 A. Nate -- well, it was during the split of the  
 14 labor council and Nate was expressing support for the  
 15 labor council and against the new working family council  
 16 and I wanted Richard and Nate to sit down to see if  
 17 there was any way that we could repair that  
 18 relationship, both between them and in the labor  
 19 movement.  
 20 Q. Okay. So you had no plans to set up a meeting  
 21 with Nate with Richard Barrera to discuss the Vasquez  
 22 and Naranjo lawsuits?  
 23 A. No.  
 24 Q. And that would have -- that topic -- by the  
 25 way, did you ever -- did that meeting ever occur?

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1 A. No.  
2 Q. So that topic you would never bring up if you  
3 met with Nate?  
4 A. It wasn't about --  
5 MR. FOUR: Objection, calls for speculation.  
6 You can answer.  
7 BY MR. CORRALES:  
8 Q. Let me rephrase the question.  
9 You had no plans to bring that up, is that  
10 right?  
11 A. No.  
12 Q. You were going to keep that separate?  
13 A. Yes.  
14 Q. Okay. Did you understand that the lawsuits  
15 were a topic of -- in the media?  
16 A. Yes.  
17 Q. Okay. And isn't it true that you wanted to  
18 meet with Nate Fairman with Richard Barrera who is,  
19 what, Mickey's second in command?  
20 A. He's our secretary-treasurer.  
21 Q. Right, secretary-treasurer, so that you can  
22 garner support for Mickey?  
23 A. No, I already told you that.  
24 Q. All right. Now, did you ever -- did you ever  
25 become aware that -- you said your partner, Oliver,

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1 what's his last name?  
2 A. James.  
3 Q. Okay. James was actually doing website work  
4 for --  
5 A. IBW.  
6 Q. Let's see, Anabel's employer?  
7 A. Yes.  
8 Q. And how did that happen to -- how did that  
9 happen to come about?  
10 A. It was prior to her working there.  
11 Q. Okay. But -- but he did --  
12 A. Yes.  
13 Q. -- right?  
14 A. Yeah.  
15 Q. And isn't it true that you contacted Mr.  
16 Fairman to discuss that?  
17 A. No.  
18 Q. Did you ever tell him that you didn't want  
19 this to occur?  
20 MR. FOUR: Objection, "want that to occur."  
21 THE WITNESS: Want what to occur?  
22 BY MR. CORRALES:  
23 Q. That Oliver was doing work on the website?  
24 A. Okay. No, that's his business.  
25 Q. Okay. So did you ever -- let me see. Hang

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1 on.  
2 Okay. Is it correct that your partner,  
3 Oliver, has a contract with Anabel's employer to run the  
4 website page?  
5 A. I'm not sure if they have a contract.  
6 Q. Okay. But he's running the website page?  
7 A. To what extent, I don't -- he built it. I  
8 don't know what else it --  
9 Q. And he's an IT person?  
10 A. Yes.  
11 Q. Okay. Did you ever send Nate Fairman --  
12 A. Uh-huh.  
13 Q. -- a message asking if he had -- if Anabel had  
14 access to the Facebook page?  
15 A. Yes.  
16 Q. And that if she did you were going to block  
17 Local 130- -- the Anabel's employer's Facebook page?  
18 A. Yes.  
19 Q. Why did you say that?  
20 A. Because I felt unsafe if she had access to my  
21 personal profile.  
22 Q. Okay. So how did you feel unsafe?  
23 A. Because of everything that transpired while  
24 she was this still an employee at Local 135.  
25 Q. Okay. What was it that you were afraid of?

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1 A. They were bullying, they were harassing us.  
2 Q. Who was bullying?  
3 A. Anabel, her boyfriend, Cristian. They were  
4 doing that online.  
5 Q. Bullying who?  
6 A. Bullying me and other coworkers.  
7 Q. What were they saying?  
8 A. It just depends. So online, I mean, Cristian  
9 said a myriad of things. Anabel online was calling  
10 everybody out at the office for not speaking out about  
11 the lawsuits, which --  
12 Q. This is after she left?  
13 A. That was before she left.  
14 Q. Okay.  
15 A. So she created a hostile work environment  
16 where she was pressuring all of us online by posting on  
17 her Facebook page that -- pretty much saying that people  
18 at the office weren't speaking out about the lawsuits.  
19 Q. Okay. So that was before she left?  
20 A. Yes.  
21 Q. After she left --  
22 A. Yes.  
23 Q. -- what did she do to bully you?  
24 A. Along the same lines. It was mostly her  
25 boyfriend, Cristian.

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1 Q. Okay, okay. So when you say "mostly," so it  
2 wasn't Anabel that did anything to bully you, so her  
3 boyfriend?  
4 A. No, she did --  
5 MR. FOUR: Objection, misstates the testimony. She  
6 said "mostly."  
7 BY MR. CORRALES:  
8 Q. Okay. So what was it that Anabel did that  
9 bullied you after she left?  
10 A. After she left? I mean, she filed a lawsuit  
11 that --  
12 Q. Okay.  
13 A. -- lied about me.  
14 Q. Other than filing a lawsuit, what else did she  
15 do that you felt was bullying you, after she left?  
16 A. I think that that was pretty substantial.  
17 Q. Okay. That was it?  
18 A. I mean, she was still saying stuff online, but  
19 nothing particular to me.  
20 Q. Okay. So what was it that her boyfriend did  
21 after she left that you felt was bullying you?  
22 A. Well, most recently I was in the hospital for  
23 surgery, for gallbladder surgery, and he Tweeted that I  
24 was in the hospital, which is private information. I  
25 found that pretty offensive.

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1 Q. Okay.  
2 A. He also accused Oliver of hacking somebody's  
3 e-mail and calling the FBI on him, so he was attacking  
4 my family.  
5 Q. Okay. Anything else?  
6 A. And myself.  
7 Q. Anything else?  
8 A. No. There's probably more. I just can't  
9 recall right now.  
10 Q. Okay. So you -- you felt it necessary to  
11 contact her boss and tell her -- tell him that you were  
12 going to block his company's Facebook page if Anabel had  
13 access to it?  
14 A. Yes --  
15 Q. Okay.  
16 A. -- because it had leaked that I was in the  
17 hospital and there is no other way that people would  
18 have known that --  
19 Q. I just said "yes" or "no." I don't need the  
20 particulars.  
21 A. Yes.  
22 Q. Okay.  
23 MR. FOUR: No, Counsel, we're going to stop. You  
24 know, she -- the witness has a right. If you want to  
25 bully her and intimidate her and --

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1 MR. CORRALES: It's not bullying.  
2 MR. FOUR: -- stop her -- and here you're  
3 interrupting me again.  
4 MR. CORRALES: I asked her a "yes" or "no" --  
5 MR. FOUR: When I interrupt you --  
6 MR. CORRALES: I asked her a "yes" or "no" question  
7 and that's all I want is a "yes" or "no" question.  
8 MR. FOUR: It doesn't matter. Questions don't  
9 require "yes" or "no" answers just because --  
10 MR. CORRALES: Yes, they do.  
11 MR. FOUR: -- Mr. Corrales asks --  
12 MR. CORRALES: No, no, no, that's the law. I'm  
13 sorry. "Yes" or "no" means "yes" or "no."  
14 MR. FOUR: Go ahead.  
15 MR. CORRALES: "Yes" or "no" means "yes" or "no."  
16 If you want to ask her questions about that later, say,  
17 well, Mr. Corrales asked you a "yes" or "no" question,  
18 give us an explanation for your answer. That's how it  
19 works, Counsel. That's your job, that's not my job.  
20 THE WITNESS: Can you preface it at the beginning  
21 at least that you want a "yes" or "no"?  
22 MR. CORRALES: No, I ask the questions the way I  
23 want to ask the questions.  
24 MR. JONES: That's fine, but she answers them the  
25 way she wants to answer them. Manny, I have --

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1 MR. CORRALES: No, no, that's not --  
2 MR. JONES: Don't talk over me, Manny. Don't talk  
3 over me. Don't talk over me. Let me finish.  
4 MR. CORRALES: No, no, I'm sorry.  
5 MR. JONES: Manny, please stop bullying the  
6 witness.  
7 MR. CORRALES: I'm not bullying the witness.  
8 MR. JONES: Please stop. Let me finish, Manny.  
9 You're talking over me again. Can you refrain from  
10 talking over me and let me talk?  
11 MR. CORRALES: You're being -- go ahead. Go ahead.  
12 MR. JONES: Thank you.  
13 MR. CORRALES: Go ahead.  
14 MR. JONES: You're bullying the witness.  
15 MR. CORRALES: I'm not bullying the witness.  
16 MR. JONES: Here you go. You've got to stop  
17 talking over me. Are you going to stop?  
18 MR. CORRALES: I'm not talking over you.  
19 MR. JONES: I would like to make a statement for  
20 the record. You keep talking over me, Manny. You do  
21 this every time.  
22 MR. CORRALES: Go ahead, please.  
23 MR. JONES: I'm trying, but every time I start to  
24 talk --  
25 MR. CORRALES: All right.



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1 MR. JONES: -- you start to talk, so can you just  
 2 stop and I'll tell you when I'm done?  
 3 MR. CORRALES: All right. Go ahead.  
 4 MR. JONES: Can you stop until I'm done?  
 5 MR. CORRALES: You're interrupting the deposition.  
 6 Go ahead.  
 7 MR. JONES: Can you stop until I tell you I'm done?  
 8 Can you do that?  
 9 MR. CORRALES: All right. You know what, I'm going  
 10 to terminate the deposition because you are interrupting  
 11 the deposition.  
 12 MR. JONES: I'm not interrupting. I'm trying to  
 13 make a statement.  
 14 MR. CORRALES: What do you want to say? What is it  
 15 you want to say?  
 16 MR. JONES: Counsel, for the record, I want to show  
 17 that counsel has gotten out of his seat. He has come  
 18 over across the table and he has gotten in my face.  
 19 THE WITNESS: Wow.  
 20 MR. JONES: He is now trying to bully me by getting  
 21 into my face.  
 22 MR. CORRALES: What do you want to say?  
 23 MR. JONES: It's completely inappropriate. Would  
 24 you sit down and get out of my face?  
 25 MR. CORRALES: No, we're taking a break.

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1 MR. FOUR: Would you please sit down and get out of  
 2 my face?  
 3 MR. CORRALES: No, we're taking a break.  
 4 MR. FOUR: We are not taking a break. We want this  
 5 on the record.  
 6 MR. JONES: We're not going off the record.  
 7 MR. CORRALES: Come on, let's go.  
 8 MR. JONES: Would you please sit down and get out  
 9 of my face?  
 10 MR. CORRALES: No, you're being ridiculous.  
 11 MR. JONES: Don't touch me and get out of my face.  
 12 MR. CORRALES: Did I touch you?  
 13 MR. JONES: You are getting very close. You're  
 14 invading my personal space.  
 15 MR. CORRALES: You guys are being ridiculous. I'm  
 16 sorry. Why don't you just relax and get --  
 17 MR. JONES: I'm not the one out of my seat in  
 18 somebody's face, Manny. Calm down.  
 19 (Exit Mr. Corrales.)  
 20 MR. JONES: For the record, the witness has a right  
 21 to answer questions the way she deems fit. Counsel has  
 22 been extremely disrespectful, rude and bullying  
 23 throughout the deposition. Every time the witness tries  
 24 to answer a question by giving any other than a "yes" or  
 25 "no" answer, she is bullied, badgered, interrupted and

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1 precluded from doing so.  
 2 I'm trying to make an objection. I'm trying  
 3 to calm things down. I'm trying to keep Mr. Corrales  
 4 from badgering the witness and acting inappropriately.  
 5 When I objected, he immediately got up, got across the  
 6 table, came over to me, got in my face, stood above me,  
 7 hovered above me, would not get out of my face and would  
 8 not return to his seat. In my 20 years of practice, I  
 9 have not seen an attorney engage in such bullying,  
 10 reprehensible, physically intimidating behavior.  
 11 Thank you. We're off the record.  
 12 MR. FOUR: Hold on, hold on. And I will just -- I  
 13 had objected several times earlier on the bullying  
 14 tactics of Mr. Corrales. And I also wanted to state for  
 15 the record because I'm sitting here that everything that  
 16 Mr. Jones just described about Mr. Corrales getting out  
 17 of his seat, yelling at Mr. Jones, interrupting him and  
 18 then standing over him, that every -- all of his  
 19 descriptions were accurate and just occurred and that  
 20 Mr. Corrales is still outside of the room.  
 21 (A short break was had.)  
 22 MR. CORRALES: We can go back on the record.  
 23 MR. JONES: I assume you had it read back.  
 24 MR. CORRALES: I don't need to have it read back.  
 25 MR. FOUR: I do want to make another statement on

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1 the record now before we begin.  
 2 If we could ask the witness this, too. First,  
 3 because of what just occurred and obviously what is on  
 4 the record, we asked the witness outside if she is able  
 5 to continue the deposition and -- and I would like to  
 6 say on the record, are you able to continue this  
 7 deposition today?  
 8 THE WITNESS: Yes, as long as if you don't get up  
 9 and aggressive again.  
 10 MR. FOUR: And you are speaking to Mr. Corrales?  
 11 THE WITNESS: Yes.  
 12 MR. CORRALES: That's fine. That's fine.  
 13 MR. FOUR: Thank you.  
 14 MR. CORRALES: Okay. And I would appreciate,  
 15 Counsel, also to keep it professional, everybody here.  
 16 MR. JONES: Counsel --  
 17 MR. CORRALES: Not raising voices and not long  
 18 objections. Thank you.  
 19 MR. JONES: Counsel, we have been more than  
 20 professional. We will continue to be.  
 21 MR. CORRALES: I won't comment on that.  
 22 MR. JONES: I think the record reflects --  
 23 MR. CORRALES: I won't comment on that.  
 24 MR. JONES: I think the record reflects who has  
 25 been out of line.

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1 MR. CORRALES: No, no, don't start pointing  
2 fingers. I don't want to hear that. Let's all be  
3 professional. Can we agree to do that?  
4 MR. JONES: I'm trying to be professional with you.  
5 What you just engaged in was one of the most  
6 unprofessional things I've ever seen in my 20 --  
7 MR. CORRALES: That is -- don't go there again,  
8 please. Please do not go there.  
9 MR. JONES: And I could very well file a state bar  
10 complaint.  
11 MR. CORRALES: You are?  
12 MR. JONES: I could very well.  
13 MR. CORRALES: Well, don't threaten anybody with a  
14 state bar complaint because that's a state bar offense.  
15 MR. JONES: I will discuss it with my -- I want to  
16 discuss it with my colleagues --  
17 MR. CORRALES: Oh, come on.  
18 MR. JONES: -- because I think that you standing up  
19 in the middle of the deposition and trying to physically  
20 intimidate me is -- crosses the line, Manny.  
21 MR. CORRALES: I don't think so. No one is doing  
22 that, okay?  
23 MR. JONES: That's exactly what happened.  
24 MR. CORRALES: No one is doing that, okay, and I  
25 apologize if I stood up because I wanted to -- I wanted

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1 to --  
2 MR. JONES: Your apology is not accepted, Manny.  
3 MR. CORRALES: Okay. I wanted to terminate the  
4 deposition because of what you guys were doing and I  
5 took a break, but I was not trying to attack you and I  
6 think you saying on the record that I touched you is  
7 false. Everybody here in the office knows I did not  
8 touch you.  
9 MR. JONES: You made a motion towards me. You were  
10 standing very close to me. I asked you --  
11 MR. CORRALES: No, no, you said on the record --  
12 MR. JONES: I asked you repeatedly, I said, "Don't  
13 touch me," and you started --  
14 MR. CORRALES: Counsel, no, you said -- you said I  
15 was touching you. Everybody heard that.  
16 THE WITNESS: You made a motion --  
17 MR. JONES: The record speaks for itself --  
18 MR. CORRALES: And, no, I did not make a motion to  
19 touch him.  
20 MR. JONES: You did.  
21 MR. CORRALES: Don't try to --  
22 MR. JONES: You were in my face. I asked you  
23 repeatedly, "Get out of my face. Get out of my personal  
24 space." You would not, so for you to come back in here  
25 and say that you're not intimidating someone is absurd.

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1 MR. CORRALES: Can we just go on, please?  
2 MR. JONES: We can go on.  
3 MR. CORRALES: All right. Let's go on.  
4 MR. JONES: But you have not heard the end of this.  
5 I guarantee you that.  
6 MR. CORRALES: All right. Do what you want to do,  
7 but let's go on with the deposition, please.  
8 MR. JONES: Understood. Understood.  
9 MR. CORRALES: Thank you.  
10 All right. The last question, please.  
11 (Record read as requested.)  
12 I'm going to move to strike the last part of  
13 your answer as nonresponsive. All I wanted was a "yes"  
14 or "no."  
15 MR. FOUR: Okay. The record will stand. Your  
16 answer is in the record.  
17 MR. CORRALES: It's in the record, but I've made a  
18 motion to strike. That's fine.  
19 BY MR. CORRALES:  
20 Q. Okay. So is it correct that you were  
21 contacting Anabel's employer after she left Local 135,  
22 "yes" or "no"?  
23 A. No.  
24 Q. You didn't contact her boss?  
25 A. I contacted my friend, Nate Fairman.

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1 Q. Well -- okay. You contacted Nate -- what's  
2 his name, Freeman?  
3 A. Fairman.  
4 Q. Fairman?  
5 A. Uh-huh.  
6 Q. And he is her boss, right?  
7 MR. FOUR: Objection, asked and answered numerous  
8 times.  
9 BY MR. CORRALES:  
10 Q. Correct?  
11 A. Yes.  
12 Q. He is also your friend, you say?  
13 A. Uh-huh.  
14 Q. Is that a "yes"?  
15 A. Yes.  
16 Q. Okay. But you knew that he was her  
17 supervisor?  
18 A. Yes.  
19 Q. And you also knew that if you contacted -- you  
20 also knew that when you were contacting him, she was  
21 still working for him, correct?  
22 A. I didn't know.  
23 Q. Did you think that she left?  
24 A. I didn't know.  
25 Q. Well, why would you contact -- when you

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1 contacted him, did he verify that she was still working  
2 for him?  
3 A. No.  
4 Q. So --  
5 A. Not the last time when I asked about the  
6 Facebook post.  
7 Q. So you thought that perhaps she wasn't working  
8 there anymore?  
9 A. He said that she didn't have access to it, so  
10 I didn't know if she was still working there or not. I  
11 blocked her on all social media and I'm no longer  
12 friends with him on social media, so I did not know.  
13 That's my answer.  
14 Q. You were friends with him, right?  
15 A. Prior.  
16 Q. Are you friends with him now?  
17 A. No.  
18 Q. Okay. So you're saying that when you  
19 contacted him the last time, you didn't know if she was  
20 still working there?  
21 A. No.  
22 Q. When you spoke to him on the phone -- was it  
23 on the phone?  
24 A. No, we didn't speak on the phone.  
25 Q. Was it --

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1 A. I believe it was text messages.  
2 Q. Okay. When it was on the text message --  
3 A. Uh-huh.  
4 Q. -- you were telling him that -- that you  
5 didn't want her to have access to the Facebook page on  
6 the website?  
7 A. No, I didn't tell him. I asked him.  
8 Q. Asked him what?  
9 A. If she had access to their Instagram account.  
10 Q. And he said yes?  
11 A. He said "No." That's all he responded.  
12 Q. Okay.  
13 A. That she does not have access.  
14 Q. Okay. And then what else did you say?  
15 A. I told him that I felt extremely uncomfortable  
16 because it had leaked that I was in the hospital.  
17 Q. And then what did he say in response?  
18 A. I don't remember. I don't think he responded.  
19 Q. Did he ever say to you, no, she's not working  
20 for me anymore?  
21 A. He -- no.  
22 Q. So you just concluded that on your own?  
23 A. He didn't confirm it.  
24 Q. Confirm what?  
25 A. That she was still working there.

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1 Q. Did you tell him -- did you ask him if she  
2 was --  
3 A. No.  
4 Q. Wait a minute, let me rephrase.  
5 Did you ask him if she was still working for  
6 him?  
7 A. No.  
8 Q. You just thought that she wasn't?  
9 MR. FOUR: Objection, misstates the testimony.  
10 THE WITNESS: I didn't say that.  
11 MR. FOUR: She never said that she thought she  
12 wasn't working there.  
13 BY MR. CORRALES:  
14 Q. Did you think that she wasn't working there  
15 anymore?  
16 A. I didn't know.  
17 Q. You didn't know?  
18 A. No.  
19 Q. So if you didn't know if she was still working  
20 there, why would you contact him?  
21 A. I just --  
22 MR. FOUR: Objection, argumentative, asked and  
23 answered.  
24 BY MR. CORRALES:  
25 Q. You answered.

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1 A. Uh-huh.  
2 Q. Why would -- if you didn't know if she was  
3 still working there --  
4 A. Yeah.  
5 Q. -- why would you contact him?  
6 A. I assumed she would still be working there,  
7 but I didn't know.  
8 Q. Did you ask him to confirm if she was still  
9 working there?  
10 A. No.  
11 MR. FOUR: Objection, asked and answered.  
12 THE WITNESS: You already asked me that.  
13 BY MR. CORRALES:  
14 Q. Did you believe that if she was no longer  
15 working there that it would not be necessary for you to  
16 ask him if she had access to the Facebook page?  
17 MR. FOUR: Can I have that question read back,  
18 please?  
19 (Record read as requested.)  
20 MR. FOUR: Do you understand the question?  
21 THE WITNESS: You're asking me if I thought she  
22 wasn't working there, why would I have contacted him?  
23 BY MR. CORRALES:  
24 Q. Basically, yes.  
25 A. Okay. I don't know.

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1 Q. Okay. Did you ever contact Nate Fairman at  
2 any time to discuss the lawsuits of either Vasquez or  
3 Naranjo?  
4 A. No.  
5 Q. Did you ever contact Nate Fairman to inform  
6 him about what's going on in those two lawsuits?  
7 MR. FOUR: Objection, vague and ambiguous as to  
8 "what's going on."  
9 THE WITNESS: What do you mean by that?  
10 BY MR. CORRALES:  
11 Q. Like give him the, you know, play-by-play.  
12 Today we had the -- there was a deposition taken of this  
13 witness.  
14 A. No.  
15 Q. And this was going on here and, you know,  
16 we're --  
17 MR. FOUR: Let him finish.  
18 BY MR. CORRALES:  
19 Q. -- the lawsuit is going forward and there's a  
20 motion in court or something?  
21 A. No.  
22 Q. Okay. Did you ever send a message to Nate  
23 about why he hired Anabel?  
24 A. Yes.  
25 Q. Okay. When was that?

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1 A. I'm not sure when it was. It was after I  
2 found out she was working there and I texted him as a  
3 friend. Is this a "yes" or "no" or can I explain?  
4 MR. FOUR: You can explain. Do you have an  
5 explanation? Please finish your answer.  
6 THE WITNESS: Yes. So --  
7 MR. CORRALES: Okay. No, I don't --  
8 MR. FOUR: Okay. Here we go. We're going to go  
9 through this again.  
10 MR. CORRALES: No.  
11 MR. FOUR: You have to let the witness answer the  
12 question, Manny.  
13 MR. CORRALES: Let me have the question. I want  
14 her to answer the question and not a narrative. There's  
15 a certain point --  
16 MR. FOUR: She's not giving you a narrative.  
17 MR. JONES: Move to strike the narrative if you  
18 want.  
19 MR. CORRALES: Can I have -- let me have the  
20 question and the answer, please.  
21 And, Counsel, please do not laugh. This is  
22 not a funny matter.  
23 MR. JONES: It is, Manny. You're --  
24 MR. CORRALES: It is not funny.  
25 MR. JONES: What is funny is the fact that you

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1 think that at a deposition you can force a witness to  
2 say "yes" or "no" and that the witness can't explain her  
3 response. That's what's funny because that's clearly  
4 not what the law says.  
5 MR. CORRALES: I'm sorry, but I disagree with you.  
6 You know that's not true.  
7 Can we have the question and answer read back,  
8 please.  
9 (Record read as requested.)  
10 MR. CORRALES: That was the answer. Okay.  
11 BY MR. CORRALES:  
12 Q. So when you texted him about that, why did you  
13 do that?  
14 A. Okay. So explanation.  
15 Q. Yes.  
16 A. I texted him because I felt that Anabel was  
17 harassing myself and our staff and as a friend I didn't  
18 understand and I was offended as a friend that he would  
19 hire her knowing that.  
20 Q. Okay. And you said you were offended? I  
21 didn't hear what you said?  
22 A. As a friend, yes.  
23 Q. You were offended as a friend?  
24 A. That he would hire her after knowing that she  
25 harassed myself and our staff.

Page 108

1 Q. Okay. Now, did you actually use that word  
2 that you were offended as a friend, did you use that  
3 phrase?  
4 A. I told him as a friend, I'm not sure if I used  
5 the word "offended."  
6 Q. Okay. Did you -- what word did you think you  
7 used?  
8 A. I'm not sure.  
9 Q. You were concerned as a friend?  
10 A. I'm not sure.  
11 Q. Okay. Do you still have those text messages?  
12 A. I probably do, yeah.  
13 Q. Okay. And did you use the word "as a friend"?  
14 A. Yes, I believe I did.  
15 Q. Okay, all right. And what else did you say  
16 about or ask him why he hired Anabel?  
17 A. I think that's it.  
18 Q. Okay. What did he say in response?  
19 A. He said, again, that he just wanted to  
20 organize.  
21 Q. Okay. He said he just wanted to organize?  
22 A. Yes, and --  
23 Q. What did you understand that to mean?  
24 A. He had an organizing campaign with a call  
25 center which they lost and he said that he just wanted

Page 109

1 to organize. So I'm assuming that what he meant was  
2 that he hired her to organize that call center.  
3 Q. Okay.  
4 A. Yes.  
5 Q. What did he say in response to your claim that  
6 she had harassed you or the staff?  
7 A. He didn't say anything.  
8 Q. Did he -- did you ask him to talk to her?  
9 A. No.  
10 Q. When you said that -- when you sent the text,  
11 you were asking him basically why did you hire Anabel?  
12 A. Yes.  
13 Q. Okay. And you were telling him -- you were  
14 asking him why did you hire Anabel because she was  
15 harassing me and the staff?  
16 A. Yes.  
17 Q. Okay. Did you believe that if you told him  
18 that --  
19 A. Uh-huh.  
20 Q. -- that he would reconsider and let her go?  
21 A. No, he didn't care.  
22 Q. Well, did you care?  
23 A. If -- can you clarify that?  
24 Q. Whether or not he let her go.  
25 A. He already hired her. The damage was already

Page 110

1 done.  
2 Q. So if -- did you think -- or let me rephrase  
3 the question.  
4 Did you want him to let her go?  
5 A. No, I wanted him not to hire her in the first  
6 place.  
7 Q. Okay, all right. And what good do you think  
8 it would have done to tell him this if you didn't expect  
9 him to let her go?  
10 MR. FOUR: Objection, argumentative, relevance.  
11 You can answer if you can.  
12 THE WITNESS: I wasn't asking him in the context of  
13 him as an employer. I was asking him in the context of  
14 our friendship and I was wondering where we stood as  
15 friends because if he -- if he hired her and he knew  
16 what she had done to our staff, I was wondering if we  
17 were no longer friends.  
18 BY MR. CORRALES:  
19 Q. Okay. So were you still -- in what way were  
20 you still friends with him? I mean, did you meet with  
21 him? Socialize with him?  
22 A. No. I mean, we talked on occasion, but I  
23 mean, we were just friends. I went to -- I was at his  
24 wedding, you know, I -- I --  
25 Q. When were you at his wedding?

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1 A. Oh, when did he get married? I think it was  
2 2015 or maybe 2016.  
3 Q. So at the time that you sent this text -- I  
4 think you said it was a text, right?  
5 A. Yes.  
6 Q. When was the last time you actually did things  
7 with him as a friend?  
8 A. Not for a while. Honestly, since -- since the  
9 lawsuits and the split in labor I hadn't for a while.  
10 Q. Give me a --  
11 A. I did talk to him because he has -- he was  
12 having a baby and we talked and I said, I need your  
13 address because I want to send you a gift for your baby.  
14 Q. When was that?  
15 A. It was around the same time.  
16 Q. Of the text?  
17 A. Yeah, it was before that, I believe. Before  
18 he hired her.  
19 Q. Okay.  
20 A. Yeah.  
21 Q. When do you think that was? Right after she  
22 left?  
23 A. It was af- -- I don't think it was right after  
24 she left. It was -- I'm not sure. I don't know. It  
25 was after she left, but before she started working

Page 112

1 there.  
2 Q. Okay. All right.  
3 A. Whatever time window that was.  
4 Q. Okay. So did you think that Nate's hiring of  
5 Anabel would impact your friendship with Nate?  
6 A. Yes.  
7 Q. How?  
8 A. Because I was -- I explained to him everything  
9 that Anabel and Cristian had done to myself, to my  
10 partner, to our staff and for me I felt that -- that  
11 if -- that wasn't something that I would have done to a  
12 friend. I wouldn't have hired somebody who I knew  
13 harassed my friend.  
14 Q. Okay. Did you send him a copy of Anabel's  
15 lawsuit?  
16 A. No, but I told her -- him that she lied about  
17 me in it.  
18 Q. Okay. You said that in the text?  
19 A. At one point. I don't remember if it was in a  
20 text, but I told him, "Anabel lied about me in her  
21 lawsuit."  
22 Q. Okay, all right. Let's just take it one at a  
23 time.  
24 A. Yes.  
25 Q. You said you didn't send him a copy of the

Page 113

1 complaint, correct?  
2 A. No, not that I remember.  
3 Q. Okay. Is there any reason why you didn't do  
4 that?  
5 A. I don't remember.  
6 Q. You -- you said that you felt bullied by  
7 Anabel because she filed a lawsuit, correct?  
8 A. And the way that she acted while she was  
9 employed --  
10 Q. Okay, all right.  
11 A. -- at the local.  
12 Q. Yes, but after she filed the lawsuit, you felt  
13 bullied, correct?  
14 A. Yes.  
15 Q. So why didn't you send Nate the lawsuit if you  
16 felt that was evidence of her bullying you after she  
17 left?  
18 MR. FOUR: Objection, asked and answered.  
19 THE WITNESS: I didn't feel I needed to.  
20 BY MR. CORRALES:  
21 Q. Why?  
22 A. Because he was my friend and I told him that  
23 she lied about me in her lawsuit. I didn't --  
24 Q. Go ahead.  
25 A. I didn't think that I would need to give him

Page 114

1 the law -- the actual lawsuit.  
2 Q. Did he ask you to send to it him?  
3 A. No, I don't believe so.  
4 Q. Okay. When -- when Vasquez's lawsuit came  
5 down, you gave that to Anabel, correct?  
6 A. Yes.  
7 Q. When Sandy's lawsuit came down, you gave that  
8 to Anabel, correct?  
9 A. I don't remember if I gave her Sandy's, but I  
10 gave her -- I remember giving her the --  
11 Q. I think you said you did.  
12 A. No, I don't. I said --  
13 Q. Okay.  
14 A. I said that I remember giving her Isabel's and  
15 I don't remember if I gave her Sandy's.  
16 Q. All right. But you gave that to Anabel  
17 because, at least Vasquez's --  
18 A. Yes.  
19 Q. -- because you -- because you wanted her to  
20 know about some of those allegations, correct?  
21 A. I wanted to find --  
22 MR. FOUR: Objection, misstates the testimony.  
23 THE WITNESS: Okay. I wanted to find out if she  
24 knew anything.  
25 BY MR. CORRALES:

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1 Q. All right. Now, did you attend a meeting  
2 in -- I think the end of the year in 2016, December --  
3 A. Uh-huh.  
4 Q. -- when the Vasquez lawsuit came out -- came  
5 out and Anabel participated by telephone when she was in  
6 Mexico?  
7 A. I was at that staff meeting, yes.  
8 Q. You were physically there?  
9 A. Yes.  
10 Q. Okay. And at that time you were talking about  
11 the Vasquez lawsuit -- I mean, let me rephrase the  
12 question.  
13 At that time the Vasquez lawsuit had just come  
14 down?  
15 A. Yes.  
16 Q. And so is it fair to say that you were talking  
17 in the staff meeting -- the people were talking in the  
18 staff meeting about that lawsuit?  
19 MR. FOUR: Objection, vague as to people talking.  
20 It assumes facts not in evidence that people were  
21 talking as opposed to any specific individual was  
22 talking.  
23 BY MR. CORRALES:  
24 Q. You can answer.  
25 A. Yeah, I -- it wasn't much of a discussion. It

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1 was just information. They were sharing information  
2 that she had filed a lawsuit.  
3 Q. Okay. And Mickey was talking, correct?  
4 A. Yes.  
5 Q. And other people were talking in the staff  
6 meeting?  
7 A. Yeah, I don't remember who.  
8 Q. Were you talking in the staff meeting?  
9 A. I don't believe I talked at that staff  
10 meeting.  
11 Q. Okay. You just heard what was being said?  
12 A. Yes.  
13 Q. And it wasn't -- it wasn't just Mickey that  
14 was talking, correct?  
15 A. I believe it was just Mickey who was talking,  
16 but I don't remember.  
17 Q. All right, okay. And was Mickey talking about  
18 the Vasquez lawsuit?  
19 A. Yes.  
20 Q. Was he also talking about Sandy's lawsuit?  
21 A. I don't remember. I only remember that he was  
22 talking about Isabel's lawsuit.  
23 Q. Do you believe that if Sandy's lawsuit had  
24 been filed, that he was also talking about Sandy's  
25 lawsuit?

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1 MR. FOUR: Objection, asked and answered, calls for  
2 speculation.  
3 THE WITNESS: I don't know.  
4 BY MR. CORRALES:  
5 Q. Would there be any reason for him not to?  
6 MR. FOUR: Objection, calls for speculation. That  
7 would be wild speculation.  
8 You don't have to answer --  
9 THE WITNESS: I don't know what he was thinking.  
10 MR. FOUR: You don't have to answer that question.  
11 BY MR. CORRALES:  
12 Q. Okay. Did Mickey say, Well, we already had a  
13 meeting about Sandy's lawsuit, so we're just going to  
14 talk about Isabel's lawsuit? Did he say anything like  
15 that?  
16 A. Did he say that? No.  
17 Q. Okay. Did he give -- did he say anything at  
18 the meeting that would indicate to you that he didn't  
19 want to talk about Sandy's lawsuit?  
20 A. No.  
21 Q. So is it possible that Sandy's lawsuit was  
22 discussed, but you just don't remember?  
23 MR. FOUR: Objection, calls for speculation.  
24 THE WITNESS: I already said I don't remember.  
25 BY MR. CORRALES:

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1 Q. Okay. What, if anything, did Mickey say about  
2 what the employees should do in relationship to the  
3 Vasquez lawsuit?  
4 A. To not talk about it.  
5 Q. Okay. What did he say specifically?  
6 A. That just to pretty much -- I'm paraphrasing,  
7 but to remain professional and don't talk about it --  
8 Q. Okay.  
9 A. -- at the office.  
10 Q. Okay. And did you ever talk about it?  
11 A. We were told not to.  
12 Q. I didn't ask you -- that's not the question.  
13 Okay?  
14 A. No.  
15 Q. Okay, thank you. So did you at any time send  
16 face messages -- not face messages -- Facebook messages,  
17 is that possible, to send Facebook messages?  
18 A. Yes, messaging.  
19 Q. Did you ever send any Facebook messages to  
20 Anabel about the lawsuits?  
21 A. Yes, outside of work.  
22 Q. Okay. Let me --  
23 A. I guess I wanted to be clear about --  
24 Q. Just answer "yes" or "no," ma'am.  
25 MR. FOUR: No, no, no, she's going to finish her

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1 answer and you can later move to strike if you want.  
2 Please go ahead and finish your answer,  
3 please.  
4 MR. CORRALES: I just did. No, you answered the  
5 question.  
6 MR. FOUR: No, finish. Do you have more of an  
7 answer?  
8 THE WITNESS: Yes.  
9 MR. FOUR: Go ahead. Finish your answer.  
10 THE WITNESS: Mickey said not to talk about it at  
11 work.  
12 MR. CORRALES: Okay. Move to strike as  
13 nonresponsive.  
14 BY MR. CORRALES:  
15 Q. I'll ask you again, just answer the question  
16 "yes" or "no."  
17 A. Sure.  
18 Q. Did you ever send Facebook messages to Anabel  
19 about the lawsuits?  
20 A. Yes, and you already asked me that before.  
21 Q. Okay, thank you. And you mentioned something  
22 about Mickey told you not to talk about the lawsuits at  
23 work?  
24 A. Yes.  
25 Q. Did you ever understand that there was an

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1 exception to talking about the lawsuits online?  
2 A. No.  
3 Q. Okay. Did Mickey ever tell you that you  
4 talking about the lawsuits at work didn't mean you  
5 couldn't talk about it online?  
6 A. Can you repeat that?  
7 MR. CORRALES: Madam Court Reporter.  
8 (Record read as requested.)  
9 THE WITNESS: Did he ask me if -- didn't mean -- I  
10 want to say "no."  
11 BY MR. CORRALES:  
12 Q. Okay. So --  
13 MR. FOUR: Do you understand what he's asking you?  
14 THE WITNESS: He's saying -- can -- I -- so you're  
15 saying that did Mickey ever -- I'm sorry, can you repeat  
16 it again because it's almost like a double negative.  
17 BY MR. CORRALES:  
18 Q. I can rephrase it.  
19 A. Okay, thank you.  
20 Q. Did Mickey ever say to you in your presence  
21 don't talk about the lawsuit at work, but it's okay to  
22 talk about it online?  
23 A. No, he never said that.  
24 Q. Did you understand that that would be okay?  
25 A. No, and I took that risk anyway.

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1 Q. Okay. When you said you took that risk  
2 anyway, what did you mean by that?  
3 A. I wanted to find out if any of it was true.  
4 Q. So you engaged in text messages and Facebook  
5 messages about the lawsuit contrary to what you believe  
6 to have been the instructions by Mickey?  
7 A. Yes.  
8 Q. Okay. And did you engage in Facebook messages  
9 with Anabel about the lawsuit?  
10 A. Yes.  
11 Q. After -- when I say "the lawsuit," I mean  
12 after the Vasquez lawsuit was filed.  
13 A. No, after Isabel's lawsuit was filed I really  
14 didn't talk to Anabel all that much more.  
15 Q. Did you engage in Facebook messaging with  
16 Anabel after the Vasquez lawsuit was filed about the  
17 Vasquez lawsuit?  
18 A. Okay. Yes, I did.  
19 Q. Okay.  
20 A. Yes. Sorry.  
21 Q. All right. And you -- and when you said you  
22 took that risk anyway --  
23 A. Uh-huh.  
24 Q. -- were you referring to that?  
25 A. Yes.

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1 Q. Why did you do that?  
2 A. Because I wanted to find out if she knew  
3 anything.  
4 Q. Okay.  
5 A. And if any of it was true so that I could  
6 navigate what I was going to do as far as my employment.  
7 Q. You wanted to find out if what Vasquez said  
8 was true?  
9 A. Yes.  
10 Q. Okay. Because you wanted to end your  
11 employment if it was true?  
12 A. If it was true, I -- that was an option that I  
13 would no longer work there.  
14 Q. All right. Did you ever -- did you ever tell  
15 Anabel that you were concerned because you had -- you  
16 were getting ready to reach your anniversary for health  
17 insurance?  
18 A. No.  
19 Q. Or you were concerned about health insurance?  
20 A. I don't believe so.  
21 Q. Did you ever, for example, tell Anabel in a  
22 text or a Facebook message that -- words to the effect,  
23 quote, Well, I'm fucked either way. Just remember this  
24 is my job. I actually get health insurance for the  
25 first time in years on the 11th.

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1 A. Uh-huh.  
2 Q. Do you remember saying that?  
3 A. I apparently said it, yes.  
4 Q. Does that refresh your recollection that you  
5 said that?  
6 A. Yes.  
7 Q. And did you also say, "I also love Sandy. I  
8 was in her wedding"?  
9 A. Uh-huh.  
10 Q. "There when her daughter was born" --  
11 A. Yep.  
12 Q. -- "and when her mother got sick."  
13 A. Yep.  
14 Q. "I've reached out and nothing. Even sent  
15 Frida Christmas gifts in the mail."  
16 A. Yep.  
17 Q. "You don't owe me anything, but you have my  
18 number. I'd rather you call me than assume shit." Do  
19 you remember saying that?  
20 A. Yes.  
21 MR. FOUR: And the last part you said, "and assume"  
22 what?  
23 MR. CORRALES: Shit.  
24 MR. FOUR: Shit. Thank you.  
25 THE WITNESS: Yes, I said that.

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1 BY MR. CORRALES:  
2 Q. And then you said, "Literally" -- this says  
3 "Literally just talk to me. As far as whoever else  
4 you're going to blow up to bring him down, do what you  
5 have to do on your crusade. Sandy is lucky to have  
6 you."  
7 Do you remember saying that?  
8 A. I don't remember saying it, but I obviously  
9 did.  
10 Q. Okay. I'm going to --  
11 A. Yeah, I don't know the context of that.  
12 Q. I'm going to show you this just to refresh  
13 your recollection.  
14 A. Yes.  
15 Q. That's what it says. Did I read that  
16 correctly?  
17 A. Yeah.  
18 MR. FOUR: Okay. Hold on. Hold on one second. I  
19 just want you to read the whole thing.  
20 BY MR. CORRALES:  
21 Q. Just this right here (indicating.) Just what  
22 I just read here, did I read that correctly?  
23 A. Uh-huh.  
24 Q. Okay. I just want to refresh your  
25 recollection.



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1 A. Yes --

2 Q. You did say that?

3 A. This was after --

4 MR. FOUR: Hold on, I'm her counsel. I have a

5 right to look at it.

6 MR. CORRALES: Okay. Go ahead, look at it.

7 MR. FOUR: Okay.

8 BY MR. CORRALES:

9 Q. Okay. So what did you mean when you said, "As

10 far as whoever else you're going to blow up to bring him

11 down, do what you have to do on your crusade."

12 What did you mean by that?

13 A. I believe I was talking about the fact that

14 they had called the FBI on my Green Card holding

15 boyfriend.

16 Q. Okay. Back up. Who called the FBI?

17 A. Anabel's boyfriend.

18 Q. Okay. He called the FBI on --

19 A. Oliver, my partner for ten years.

20 Q. Called FBI, okay. So when you said who

21 else -- "As far as whoever else you're going to blow up

22 to bring him down," who did you mean by "bring him

23 down"?

24 A. I don't know. Do you have the prior messages?

25 I don't know what context that's in so it's --

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1 Q. Yes. It sounds like it might be referring to

2 Mickey, but you tell me. Do we have --

3 MR. FOUR: If you don't remember --

4 THE WITNESS: I don't remember.

5 MR. FOUR: Do you want to put that in the full

6 conversation as an exhibit?

7 THE WITNESS: Yeah, I can't tell if...

8 BY MR. CORRALES:

9 Q. Okay. This is a 12/20 -- well, it just starts

10 here with January 2nd. I just read it to you. "Well,

11 I'm fucked either way. Just remember this is my job."

12 Do you remember I read that to you?

13 "I actually get health insurance for the first

14 time in years on the 11th. I also love Sandy. I was in

15 her wedding. There when her daughter was born. When

16 her mother got sick. I've reached out and nothing.

17 Even sent Frida Christmas gifts in the mail. You don't

18 owe me anything, but you have my number. I'd rather you

19 call me than assume shit. Literally, just talk to me.

20 As far as whoever else you're going to blow up to bring

21 him down, do what you have to do on your crusade. Sandy

22 is lucky to have you."

23 This is January 2nd, 8:55 p.m.

24 MR. FOUR: Do you need to see the full

25 conversation?

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1 THE WITNESS: I would like to see the full

2 conversation.

3 MR. CORRALES: That's all I have, January 2nd.

4 MR. FOUR: I think we should put this in as an

5 exhibit to the deposition since we're referring to it.

6 THE WITNESS: Is there something before this one?

7 BY MR. CORRALES

8 Q. No, that's where it starts. That's December

9 20th.

10 MR. FOUR: But that's what she wants to see.

11 MR. CORRALES: Yeah, but just look at what I showed

12 you. That's my work product, ma'am.

13 MR. FOUR: Okay. We don't have a right -- you're

14 right about that. I'm not trying to look, but she wants

15 to see where it began.

16 MR. CORRALES: Yes, it begins at January 2nd.

17 MR. FOUR: And just so it's clear on the record,

18 the witness is now reading -- we don't know what page

19 number it is, but I'm going to identify in this packet

20 at the top it says 12/20/2016, 7:21 p.m. and at the very

21 bottom right -- oh, it does say in the left corner 3 of

22 6 and at the bottom right corner 12/12/17, 8:23 a.m.

23 MR. CORRALES: Okay. So --

24 MR. FOUR: No, no, no, you can't -- he may have

25 documents -- you think there is one prior?

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1 THE WITNESS: Yeah, that looks to be like one

2 prior.

3 MR. CORRALES: The one prior is not -- this is

4 12/20. This starts January 2nd. I didn't want her to

5 look at that because that's not -- that's not the prior

6 message.

7 MR. FOUR: But the witness is saying she can't

8 answer without looking at the full context. The

9 conversation isn't all within one.

10 MR. CORRALES: Well, I don't think that this is

11 part of it, but I'll make an exception, I'll let her

12 look at this, but I don't think that's part of the same

13 message because it's on a different date.

14 THE WITNESS: It's not, but it's the same context.

15 This is after the online harassment of myself and my --

16 BY MR. CORRALES:

17 Q. I don't know anything about online harassment.

18 I just -- I'll agree to let you look at this

19 (indicating) and I will agree with your counsel that we

20 will make these three pages Exhibit 1, but I only want

21 you to look at those because the rest of it is my work

22 product.

23 A. And what was your question about this? Did

24 you want me to explain?

25 Q. No, you wanted to look at it.

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1 MR. FOUR: Just look at it and then we will go on.  
 2 BY MR. CORRALES:  
 3 Q. My question is, who are you referring to?  
 4 (Saez Exhibit 1 marked.)  
 5 (Witness viewing document.)  
 6 MR. CORRALES: And, Counsel, we'll make that  
 7 Exhibit 1, those three pages.  
 8 BY MR. CORRALES:  
 9 Q. Okay. So my question to you is what I read to  
 10 you --  
 11 A. Yes.  
 12 Q. -- about as far as whoever else you're going  
 13 to blow up to bring him down, who are you referring to  
 14 when you said "bring him down"?  
 15 A. Bring him down I was referring to Mickey.  
 16 Blowing up, I was referring to myself.  
 17 Q. Okay. So why did you say that about Mickey?  
 18 A. So the con- --  
 19 Q. Bring him down.  
 20 A. Yeah, so the point is that there was extreme  
 21 online harassment. Like I said, I reached out in  
 22 earnest to find out if they knew anything and because I  
 23 didn't speak out publicly against Mickey, I started  
 24 being bullied and harassed online and, you know, they  
 25 were calling the FBI on my partner. They were harassing

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1 people at our work. Anabel actually was physically --  
 2 physical with one of our coworkers, Laurie Kern, and so  
 3 I was reacting to that. I was telling them, listen, I  
 4 don't have all the information. I'm not on one side or  
 5 the other. I was in Sandy's wedding. I sent her  
 6 daughter, Frida, which is her name, by the way, not  
 7 Frida, and I sent her a Christmas gift trying to express  
 8 to her that I had not chosen sides, that I didn't know  
 9 the information and that they needed to stop harassing  
 10 us.  
 11 Q. Okay.  
 12 A. So it was in the context of please don't bring  
 13 everybody else into this. On your crusade against  
 14 Mickey, please don't bring everybody else into this. If  
 15 you have problems with Mickey, fine, but please don't  
 16 bring our staff into this. And you can see that from  
 17 the December message.  
 18 Q. Okay. Do you know if an FBI complaint was  
 19 ever filed?  
 20 A. Cristian said he filed it. I'm not sure.  
 21 Q. All right. So your answer is no, you don't  
 22 know?  
 23 A. I don't know for sure.  
 24 Q. Okay. You said here, "Well, I'm fucked either  
 25 way." What did you mean by that?

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1 A. The whole situation.  
 2 Q. With Mickey?  
 3 A. Yeah.  
 4 Q. And the lawsuits?  
 5 A. Yeah. Either I leave or I stay, I'm fucked  
 6 either way.  
 7 Q. Okay. Well, what did you mean if you left you  
 8 were fucked?  
 9 A. I'd have to find another job and that's it.  
 10 Q. Okay. And if you stayed, how were you fucked?  
 11 A. Because people would attack me for staying and  
 12 they did.  
 13 Q. Okay.  
 14 A. And I mentioned the health care because I just  
 15 found out that I was diabetic and I didn't know if I was  
 16 going to have a lapse in my health care in between jobs,  
 17 but I was willing to do that if the allegations were  
 18 true.  
 19 Q. Did -- when you -- when you were contacting  
 20 Nate --  
 21 A. Yes.  
 22 Q. -- Fairman and asking about whether he could  
 23 meet with you and Mr. Barrera --  
 24 A. Uh-huh.  
 25 Q. -- did you -- did Mickey know that you were

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1 doing that?  
 2 A. No.  
 3 Q. So is it your testimony that Mickey did not  
 4 direct you to do that?  
 5 A. No, he did not.  
 6 Q. But obviously Mr. Barrera did?  
 7 A. No.  
 8 Q. So were you --  
 9 A. It was my idea.  
 10 Q. Okay. So why would you ask for a meeting with  
 11 Mr. Barrera if Mr. Barrera didn't know about it?  
 12 A. What do you mean? I asked Richard about it  
 13 after the fact, but it was my idea.  
 14 Q. No, before you contacted Mr. Freeman [sic], is  
 15 it?  
 16 A. Fairman.  
 17 Q. Fairman.  
 18 A. Nate Fairman.  
 19 Q. Why didn't you ask Mr. Barrera if he would go  
 20 with you to meet with Mr. --  
 21 A. Fairman.  
 22 Q. -- Fairman?  
 23 A. I didn't say that.  
 24 Q. Okay. So but I understood you from your  
 25 testimony saying that you contacted Nate and you wanted

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1 to meet with you and --  
2 A. Richard.  
3 Q. -- him to meet with you and Richard?  
4 A. I didn't say that I didn't consult with  
5 Richard about that.  
6 Q. Oh, so you did?  
7 A. I did.  
8 Q. So he knew you were contacting Nate about  
9 that?  
10 A. Yes.  
11 Q. Okay.  
12 MR. FOUR: Let him finish the question before you  
13 answer.  
14 THE WITNESS: Got it.  
15 MR. FOUR: You're starting a little bit to  
16 interrupt a little bit early. Thanks.  
17 THE WITNESS: Got it.  
18 BY MR. CORRALES:  
19 Q. What did he say when you said you were going  
20 to set up the meeting?  
21 A. Who?  
22 Q. Richard?  
23 A. Richard? He said "Okay."  
24 Q. Did he say, well, let's talk to Mickey about  
25 this first?

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1 A. No.  
2 Q. To your knowledge, did Richard Barrera tell  
3 Mickey that you were -- you'd be setting up this  
4 meeting?  
5 A. To my knowledge?  
6 Q. To your knowledge.  
7 A. No.  
8 Q. Any reason why you didn't tell Mickey?  
9 A. Because we weren't talking about Mickey.  
10 Q. Okay. Anything else?  
11 A. No.  
12 Q. Now, was this effort made to contact or set up  
13 the meeting with Nate before or after Anabel had left?  
14 A. Hmm, I don't remember. I think it was before  
15 she left. It was around the time that -- maybe it was  
16 after because it was around the time that we were  
17 cons- -- going to split from the labor council because I  
18 remember that that was the point of the meeting, how do  
19 we come together and make sure that there is no split  
20 and that we can repair the labor movement.  
21 Q. So it was after she -- after she left?  
22 A. I don't remember.  
23 Q. So when you contacted Nate to ask him if he  
24 could meet with you and Richard Barrera --  
25 A. Uh-huh.

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1 Q. -- had you contacted him before and told him  
2 what you told us today in your deposition, you know, why  
3 did you hire Anabel?  
4 A. No, it was completely different timelines. It  
5 was months apart.  
6 Q. Okay. Months apart but --  
7 A. Yeah.  
8 Q. -- was it before or after?  
9 A. The proposed meeting with Richard and Nate was  
10 before Anabel even worked there.  
11 Q. Okay. That was unclear.  
12 A. Yes.  
13 Q. So now --  
14 A. Is it clear?  
15 Q. Yes, now it's clear.  
16 A. Okay.  
17 Q. You're sure about that?  
18 A. I'm positive about that.  
19 Q. Okay. So but it was after the Vasquez  
20 lawsuits were filed?  
21 A. I believe so.  
22 Q. Okay. When you contacted Nate afterwards --  
23 A. Yes.  
24 Q. -- and one of the things you said was you were  
25 questioning why he hired Anabel, that sort of thing.

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1 A. Okay.  
2 Q. When you contacted him afterwards --  
3 A. Uh-huh.  
4 Q. -- did he say anything or did you say anything  
5 about why that meeting never occurred with Mr. Barrera?  
6 A. No.  
7 Q. Did he ever get back to you, for example, on  
8 your request to meet with you and with Mr. Barrera?  
9 A. So me, Richard and Nate had a -- I believe  
10 that we had a date scheduled and then we had to cancel  
11 because --  
12 Q. Okay.  
13 A. I forget, one of us had a scheduling conflict.  
14 Q. All right.  
15 A. And then the reschedule just never happened.  
16 Q. Okay. So did you ever follow up with that  
17 yourself?  
18 A. No.  
19 Q. Did Nate ever say, you know, do you guys still  
20 want to meet or talk?  
21 A. I don't believe so.  
22 Q. Okay, all right. Did you ever contact other  
23 union presidents or union officials in the community  
24 about these lawsuits?  
25 A. No, not that I remember. No.

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1 Q. Did you ever try and reach out to any union  
2 affiliated officials, whether they be presidents, vice  
3 presidents or managing agents of a union to try and get  
4 their support for Mickey in connection with these  
5 lawsuits?  
6 A. No, I don't believe so.  
7 Q. You understand what I mean by seeking support?  
8 A. I'm only ass- -- no, I don't.  
9 Q. Like asking if they would -- if they would --  
10 you know, where they stood in terms of these  
11 allegations.  
12 A. I don't believe so.  
13 Q. You understand this -- this #Metoo Movement  
14 going on in the media where people are coming out --  
15 A. Uh-huh.  
16 Q. -- and, you know, we have politicians, we have  
17 movie producers, actors being accused of some things and  
18 we have certain people that come out in support of them.  
19 A. Yeah.  
20 Q. And some people come out and condemn them.  
21 Okay?  
22 A. Uh-huh.  
23 Q. Do you understand that?  
24 A. Yes.  
25 Q. Okay. So my question to you is, did you make

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1 an effort to reach out to the union industry people to  
2 seek their support for Mickey in response to these  
3 allegations made against him by these lawsuits?  
4 A. No.  
5 Q. Okay. Did you ever tell Nate Fairman that you  
6 wanted to know if he would be loyal to Mickey in  
7 connection with these lawsuits?  
8 A. No.  
9 Q. Did you understand that Mickey Kasparian  
10 helped out Nate to become the president of IBW?  
11 A. That's what I heard.  
12 Q. Did you believe that -- that he owed Mickey  
13 something because of that?  
14 A. No.  
15 Q. What -- you said you were friends with Nate.  
16 What do you understand his personality to be like?  
17 MR. FOUR: Objection, vague and ambiguous.  
18 You can answer it if you can.  
19 THE WITNESS: It's mixed right now, honestly.  
20 BY MR. CORRALES:  
21 Q. Okay. Well, when you knew him as a friend and  
22 when you were contacting him --  
23 A. Yeah, he was a good --  
24 Q. -- about Anabel, what was his personality  
25 like?

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1 A. Those are two different timelines.  
2 Q. Okay.  
3 A. When I was contacting him about Anabel and  
4 when we were friends are two different timelines.  
5 Q. Okay. When you were contacting him about  
6 Anabel, you were still his friend, right?  
7 A. Debatable.  
8 Q. Before -- well, let's just do it this way.  
9 When you considered him to be your friend --  
10 A. Yes.  
11 Q. -- whenever that was --  
12 A. Prior.  
13 Q. -- what was his personality like?  
14 A. I would think that he was -- he was a good  
15 guy.  
16 Q. Was he someone that you would consider to be a  
17 nice person?  
18 A. Yes, there were some things that were  
19 questionable to me, but, yes.  
20 Q. Was he soft-spoken?  
21 A. He can get loud.  
22 Q. Was he a person that you think could be, I  
23 don't know, pushed around a little bit?  
24 MR. FOUR: Objection, calls for speculation.  
25 THE WITNESS: I don't think so. He has --

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1 BY MR. CORRALES:  
2 Q. No?  
3 A. No.  
4 Q. Is he pretty firm in where he stands?  
5 A. I would -- yeah, I would think so.  
6 Q. So do you believe that -- do you believe that  
7 as his friend that you could kind of convince him based  
8 upon his personality or couldn't convince him based upon  
9 his personality to take a stand either with or for  
10 Mickey based upon his personality?  
11 A. No.  
12 Q. So if he was -- if he had a view about it, you  
13 don't think he would change it, is that right?  
14 MR. FOUR: Objection, calls for speculation.  
15 I don't even think you can answer that  
16 question.  
17 THE WITNESS: I don't know.  
18 BY MR. CORRALES:  
19 Q. You don't know? Okay.  
20 MR. FOUR: That's pure speculation.  
21 BY MR. CORRALES:  
22 Q. Okay. So did you -- after the -- Sandy's  
23 lawsuit was filed, you said that you thought that what  
24 she said was untrue in her -- some of the things were  
25 untrue.

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1 A. Uh-huh.  
2 Q. Did you go around and tell other people that  
3 you thought she was lying about what she said in her  
4 lawsuit?  
5 A. I -- other people, yeah. Yeah.  
6 Q. Yeah? Who did you tell?  
7 A. I don't remember. I mean, so one of the  
8 reasons why I thought that Sandy lied because when I was  
9 training at the local, Sandy -- we had lunch together  
10 and Sandy told me that she was going to lie about where  
11 she was. We went to lunch together and Sandy said she  
12 was going to lie and say that she was at the labor  
13 council and I had said I'm not going to do that because  
14 I -- I'm not going to lie on my route sheets.  
15 Q. Okay. Now, you said just now that Sandy told  
16 you that she was going to lie on her route sheet about  
17 where she was --  
18 A. Yes.  
19 Q. -- and what are you referring to? Is this the  
20 time that she was suspended?  
21 A. It was before she was suspended.  
22 Q. Okay. So what time -- what timeline are we  
23 talking about? What year, what date?  
24 A. When she told me she was going to lie on her  
25 route sheet?

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1 Q. Yes.  
2 A. It was when I first started at the local, so  
3 July, August, maybe like August or September. It was  
4 when I was still training so...  
5 Q. So 2016?  
6 A. Yes.  
7 Q. Okay. What brought that up?  
8 A. What -- she brought it up.  
9 Q. Well, how did it -- I mean, just --  
10 A. We went to lunch. We actually started a  
11 committee at work and we decided to have lunch and talk  
12 about the committee. We went to Kensington Cafe and  
13 when we left Kensington Cafe, she told me, I'm not going  
14 to put that we had lunch together because people are  
15 going to be jealous. Anabel and Maribel are going to be  
16 jealous that we had lunch together or whatever.  
17 Q. Okay.  
18 A. And then she said, "I'm going to say that I  
19 was at the labor council." And I said, "I'm going to  
20 put that I was at lunch."  
21 Q. All right. And then --  
22 A. And I did.  
23 Q. Do you know if she did?  
24 A. I don't know.  
25 Q. Okay. She just said she was going to do that.

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1 You don't know if she did or not?  
2 A. I didn't see her write it down.  
3 Q. Okay.  
4 A. But she said that that's what she was going to  
5 do.  
6 Q. All right. Did you ever report that to anyone  
7 at Local 135?  
8 A. No, I didn't.  
9 Q. Did you ever, for example, ask Mickey or  
10 anyone to look into her route sheets to see if she was  
11 lying about where she was based upon what she told you  
12 at the restaurant?  
13 A. No, I did not.  
14 Q. Okay. So, for example, you don't know if she  
15 changed her mind and actually put something accurate on  
16 her route sheet --  
17 MR. FOUR: Objection --  
18 BY MR. CORRALES:  
19 Q. -- after you had lunch with her?  
20 MR. FOUR: Objection, asked and answered, calls for  
21 speculation.  
22 THE WITNESS: I don't know.  
23 BY MR. CORRALES:  
24 Q. Okay.  
25 A. There was another incident, too.

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1 Q. Wait, there's no question pending.  
2 A. Okay.  
3 Q. You said there was another incident.  
4 A. Yes.  
5 Q. Now, we have to take this step by step. Okay?  
6 A. Yes.  
7 Q. We can't just have people just talking.  
8 A. Sure.  
9 Q. You said there was another incident. What do  
10 you mean by that?  
11 A. When I was training with her as well where we  
12 went --  
13 Q. And I'm sorry, you said another incident where  
14 you felt she was lying about her route sheet?  
15 A. Yes.  
16 Q. Okay. When was that?  
17 A. There were maybe two more incidents where we  
18 went to her house and stayed there for a while -- during  
19 the workday.  
20 Q. Okay. So there was one or two instances where  
21 you --  
22 A. There was that incident and there was another  
23 incident where we were in front of a store. We were  
24 with her cousin who was riding with us.  
25 Q. Let's take it one at a time.

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1 A. Sure.  
2 Q. The first -- we'll call it the second incident  
3 because you already told us about the lunch.  
4 A. Yes.  
5 Q. Where you were at her house?  
6 A. Yes.  
7 Q. Tell me about what happened there that you  
8 felt was something where she was going to lie about  
9 where she was.  
10 A. It wasn't so much that she -- well, yeah, it  
11 was maybe that she lied where she was, but I didn't  
12 think it was appropriate that we were at her house for  
13 that long during the workday.  
14 Q. How long was it?  
15 A. I think it was like at least a couple hours.  
16 Q. Okay. And then what were you doing at her  
17 house?  
18 A. I don't remember. Just hanging out with her  
19 and her cousin.  
20 Q. Okay. And it was during the workday?  
21 A. Yeah.  
22 Q. And what were you doing at her house?  
23 A. We were -- like I said, we were just hanging  
24 out. I believe she had Frida at that time, too, so I  
25 think she was, like, getting milk. I'm not sure.

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1 Q. Who is Frida?  
2 A. Her daughter.  
3 Q. Okay. She had Frida. How old was Frida?  
4 A. I don't even think she was one yet. She  
5 was -- she was young.  
6 Q. Okay.  
7 A. She was, like, probably -- yeah.  
8 Q. Okay. Less than one year old?  
9 A. Yes.  
10 Q. Okay. So what were you doing at the house?  
11 A. Nothing.  
12 Q. Okay. Now, what was it about being at the  
13 house that you thought was lying on her worksheet?  
14 A. I just -- I was training so I had never -- I  
15 didn't know what the organizers did or what their  
16 responsibilities were and it just didn't seem like  
17 that's what we should have been doing. It seemed like  
18 we had no agenda. We had no purpose being there.  
19 Q. Okay. Did she tell you that she was going to  
20 lie about where she was that day?  
21 A. Not that day.  
22 Q. Did you ever see her route sheet that  
23 indicated to you that she lied about being at the house  
24 for two hours when she said something different on the  
25 route sheet?

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1 A. No, the only time was at the lunch.  
2 Q. Okay. The third time you said was another  
3 occasion where you felt that she might be lying about  
4 where she was?  
5 A. Yeah.  
6 Q. Where was that?  
7 A. Yeah, so -- and, again, I was training so I  
8 didn't know what the organizers' roles were, but me and  
9 her and her cousin went to a -- in front of a grocery  
10 store --  
11 Q. Okay.  
12 A. -- and we just sat in the parking lot.  
13 Q. How long did you sit in the -- when you say  
14 sit, do you mean in your car?  
15 A. In her car.  
16 Q. Okay. Sat in car in parking lot --  
17 A. Yeah.  
18 Q. -- for how long?  
19 A. A little bit over an hour, I think.  
20 Q. Okay.  
21 A. We didn't really do much -- it didn't seem  
22 like we were doing anything.  
23 Q. What did you understand why you were there at  
24 the grocery store? What was the planned purpose?  
25 A. She didn't tell me.

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1 Q. So you were training?  
2 A. Yeah, that's what I'm trying to explain to  
3 you. I didn't really learn anything.  
4 Q. Did you ever get out of the car?  
5 A. No.  
6 Q. So you were with her driving different places,  
7 I take it?  
8 A. Yes.  
9 Q. And then you parked the car for an hour at  
10 the --  
11 A. I said a grocery store.  
12 Q. You said Vons?  
13 A. No, I just said a grocery store. I don't  
14 remember what grocery store it ws.  
15 Q. What time was it?  
16 A. It was in the day. Afternoon.  
17 Q. Had you already had lunch?  
18 A. I don't remember.  
19 Q. So did you see her eat anything when you were  
20 sitting in the car?  
21 A. I don't recall.  
22 Q. Did you eat anything?  
23 A. No, I don't think so.  
24 Q. Okay. So what was it that she said about the  
25 time that you were in the car with her for this period

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1 of time at the grocery store that led you to believe  
 2 that she was going to lie about that on her route sheet?  
 3 A. That wasn't a -- I didn't think that she was  
 4 going to lie on her route sheet.  
 5 Q. Okay.  
 6 A. I just didn't know the purpose of us being  
 7 there.  
 8 Q. Were there any other instances where you  
 9 believe that she lied about where she was, other than  
 10 what you just told us?  
 11 A. Other than her telling me she was going to lie  
 12 about it?  
 13 Q. Yeah, other than what you've told us.  
 14 A. No.  
 15 Q. Okay. So why were you with Sandy while you  
 16 were training if you were a rep and she's an organizer?  
 17 A. They just assigned me to her. I was  
 18 assigned --  
 19 Q. Who assigned you to her?  
 20 A. I believe it was -- I want to say it was Todd  
 21 Walters.  
 22 Q. Okay. Did you ever -- let me rephrase the  
 23 question.  
 24 Were you ever told that you were going to be  
 25 trained to be an organizer?

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1 A. No, but if you understand our job duties,  
 2 union reps are organizers as well. We have to organize  
 3 workers.  
 4 Q. All right.  
 5 A. So we don't just represent, but we also  
 6 organize.  
 7 Q. Okay.  
 8 MR. FOUR: Can we go off the record and take a  
 9 break?  
 10 MR. CORRALES: Yeah, we were going to take a break  
 11 anyway.  
 12 (A short break was had.)  
 13 MR. CORRALES: Okay. Let's go back to -- we're  
 14 going to mark these pages here. What did we start on?  
 15 I agreed to 12/20.  
 16 MS. ARAUZ: You started right here (indicating).  
 17 MR. FOUR: There were three. That page --  
 18 MR. CORRALES: But we -- yeah, we agreed on this  
 19 page.  
 20 MR. FOUR: Well, right, so it was the three pages  
 21 to put in. That page, the next one, the next one and we  
 22 looked at the other one.  
 23 MR. CORRALES: This one, this one, and the third  
 24 one.  
 25 MR. FOUR: Right.

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1 MR. CORRALES: Okay. This will be Exhibit No. 1  
 2 and we will copy it and put it in the record.  
 3 MR. FOUR: Okay.  
 4 BY MR. CORRALES:  
 5 Q. Okay. Now, I wanted to follow-up with this --  
 6 just these three pages.  
 7 A. Uh-huh.  
 8 Q. Okay. And it starts with 12/20 and the rest  
 9 is January 2nd.  
 10 A. Uh-huh.  
 11 Q. Those three pages. If you want to review it  
 12 again, that's fine, but I want to ask you, if this was a  
 13 message -- as you read that, a message between you and  
 14 the person with the name of Brent Beltran.  
 15 A. Uh-huh.  
 16 Q. Is that a "yes"?  
 17 A. Oh, this? Oh, I don't know. Oh, I thought  
 18 this was with Anabel. I don't -- sorry.  
 19 Q. Do you want to read that again and see if that  
 20 refreshes your recollection if it was a --  
 21 A. Oh, uh-huh, this makes sense. That would make  
 22 sense that it would be to Brent.  
 23 Q. Okay. And who is Brent Beltran?  
 24 A. I don't know how to describe him. I don't  
 25 know. He does --

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1 Q. Who is he?  
 2 A. Just a person who lives in Barrio Logan.  
 3 Q. Okay. Is he a community activist?  
 4 A. Yes, I would say that.  
 5 Q. Is it your understanding that at the time this  
 6 e-mail message was exchanged between you and him that he  
 7 wanted Kasparian removed as president of Local 135?  
 8 A. Yes, he has from the beginning.  
 9 Q. Okay. And so you were telling him --  
 10 A. Uh-huh.  
 11 Q. -- or basically he was telling -- let me see.  
 12 No, you were telling him -- let me see that. I'm  
 13 confused.  
 14 A. Sure.  
 15 Q. Here we go. You were telling him, "As far as  
 16 whoever else you're going to blow up to bring him down,  
 17 do what you have to do on your crusade."  
 18 You were telling him in terms of him -- his  
 19 crusade in trying to bring Mickey down --  
 20 A. Yeah.  
 21 Q. -- you were telling him, "Sandy is lucky to  
 22 have you," meaning that Sandy was working with him?  
 23 A. No, I mean, he was obviously defending her.  
 24 Q. Oh, he was defending Sandy?  
 25 A. Yeah.

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1 Q. Okay. "Sandy is lucky to have you" --  
2 A. Yeah.  
3 Q. -- meaning him --  
4 A. Yeah.  
5 Q. -- supporting Sandy?  
6 A. Yes, because he was very vocal.  
7 Q. Okay. So you made this statement to this  
8 guy --  
9 A. Yeah.  
10 Q. -- Brent Beltran --  
11 A. Uh-huh.  
12 Q. -- "as far as whoever else you're going to  
13 blow up to bring him down," you're referring to Mickey,  
14 right?  
15 A. Uh-huh.  
16 Q. "Do what you have to do on your crusade."  
17 A. Yes, but I --  
18 Q. What did you mean by that, "do what you have  
19 to do on your crusade"?  
20 A. I don't think that I said -- I don't think  
21 that's what I meant, though. I --  
22 Q. That's what you said.  
23 A. Yeah, but I don't think that I -- I don't know  
24 who else he would have had to bring down. My message to  
25 him was trying to convey that I understand that you're

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1 on a crusade against Mickey, but please leave our staff  
2 alone. I have multiple other messages from me to Brent  
3 telling him, "Please leave our staff alone."  
4 Q. Okay, all right. And do you know a Sarah  
5 Kent?  
6 A. I do.  
7 Q. Who is she?  
8 A. She is somebody who is involved with the  
9 Democratic Party. She works at a law firm.  
10 Q. And to your knowledge, did she also want  
11 Mickey to be removed --  
12 A. Yes.  
13 Q. -- as local 135?  
14 A. Uh-huh.  
15 Q. In what way?  
16 A. In what way did she want him to be removed?  
17 Q. Yeah, like, you know, a lawsuit or anything?  
18 A. Against -- no, I don't think she was going to  
19 bring a lawsuit against him.  
20 Q. What was she doing that indicated to you that  
21 she wanted him removed?  
22 A. Like Brent, I think they were vocal on social  
23 media.  
24 Q. Okay. Did you -- did you reach out to her for  
25 support for Mickey?

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1 A. No.  
2 Q. Did you tell her that you supported her in her  
3 efforts to remove Mickey?  
4 A. I told her just like I told Brent for them to  
5 be sensitive about the people on our staff. That a lot  
6 of people were confused about what was going on and to  
7 please make sure that you leave our staff alone. People  
8 are not going to be outspoken. Some people might be  
9 scared for their jobs, but either way, leave our staff  
10 out of this.  
11 Q. Okay. But --  
12 A. That's why I reached out to her.  
13 Q. Okay. So other than that, you supported her  
14 efforts to remove Mickey?  
15 A. No.  
16 MR. FOUR: Objection, that assumes facts not in  
17 evidence.  
18 BY MR. CORRALES:  
19 Q. Did you tell her that? Did you say, I do not  
20 support your efforts for Mickey. There is nothing that  
21 Mickey did anything -- that he did wrong? Anything to  
22 that nature?  
23 A. I've never defended Mickey to anybody.  
24 Q. Okay.  
25 A. I've always said that I don't know what

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1 happened with him and Isabel.  
2 Q. You told that to Brent Beltran, that you  
3 didn't know?  
4 A. Yeah, I'm sure at one point I told him I  
5 didn't know.  
6 Q. And you said --  
7 A. I still don't know.  
8 Q. And you said that also to Sarah Kent?  
9 A. I believe so, but I'm not sure.  
10 Q. So if this case goes forward and a jury finds  
11 against Mickey, I'm talking about the Vasquez case --  
12 A. Uh-huh.  
13 Q. -- are you -- do you have plans to quit  
14 Local 135?  
15 MR. FOUR: Objection, irrelevant, incomplete  
16 hypothetical, assumes facts not in evidence, calls for  
17 pure speculation.  
18 You don't have to answer that question.  
19 THE WITNESS: Should I?  
20 MR. FOUR: Okay. Don't answer. I'm instructing  
21 you not to answer the question.  
22 BY MR. CORRALES:  
23 Q. So the question put differently is, if a  
24 verdict is reached against Mickey that comes out that he  
25 did do these things, will you support him?



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1 MR. FOUR: Same objection.  
 2 Don't answer the question.  
 3 BY MR. CORRALES:  
 4 Q. And if the verdict comes out against Mickey  
 5 that he did all these things in the Vasquez case that  
 6 you didn't know anything about, would you still -- would  
 7 you feel safe still working at Local 135?  
 8 MR. FOUR: Same objections.  
 9 You don't have to answer.  
 10 BY MR. CORRALES:  
 11 Q. And if these things came out against Mickey in  
 12 a jury verdict against him, would you support Vasquez?  
 13 MR. FOUR: Same objections, including vague and  
 14 ambiguous.  
 15 You don't answer the question.  
 16 BY MR. CORRALES:  
 17 Q. Before the deposition today, Ms. Saez, did you  
 18 talk to Mickey about your deposition?  
 19 A. No.  
 20 Q. Did you talk to anyone at the local about your  
 21 deposition, other than a lawyer?  
 22 A. I -- no, not in any -- I talked to my boss  
 23 because I had to --  
 24 Q. Who is your boss?  
 25 A. Todd Walters because I had to come here today,

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1 so I'm working.  
 2 Q. Did you talk to Todd Walters about what you  
 3 might say at your deposition?  
 4 A. No.  
 5 Q. Did you receive any e-mails or any electronic  
 6 messages from anyone in management at Local 135 about  
 7 your deposition before you came to your deposition?  
 8 A. No.  
 9 MR. CORRALES: All right. Those are all the  
 10 questions I have.  
 11 MR. FOUR: Okay.  
 12 MR. CORRALES: Do you have any questions?  
 13 MR. FOUR: Nope.  
 14 MR. CORRALES: All right.  
 15 MR. FOUR: So we're still being consistent?  
 16 MR. CORRALES: Consistent with the rules that we've  
 17 set up. No --  
 18 MR. FOUR: Yes, I understand the stipulation. I  
 19 told the reporter that off the record that it might be.  
 20 (Whereupon; the deposition concluded at 11:46 a.m.)  
 21  
 22  
 23  
 24  
 25

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\* \* \*

DECLARATION OF PENALTY OF PERJURY

I, SARAH SAEZ, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2017, at \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
 (city) (state)


\_\_\_\_\_  
 SARAH SAEZ

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1 DEPONENT'S CHANGES OR CORRECTIONS  
 2 DEPOSITION OF: SARAH SAEZ  
 3 CASE: ARAUZ VS. UFCW LOCAL 135  
 4 DATE OF DEPOSITION: DECEMBER 13, 2017

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25	Deponent's Signature _____ Date _____		

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1	REPORTER'S CERTIFICATION		
2	I, FRAN BARBER, a Registered Professional Reporter		
3	and Certified Shorthand Reporter of the State of		
4	California, do hereby certify:		
5	That the foregoing proceedings were taken		
6	before me at the time and place herein set forth; that		
7	any witnesses in the foregoing proceedings, prior to		
8	testifying, were administered an oath; that a record of		
9	the proceedings was made by me using machine shorthand		
10	which was thereafter transcribed under my direction;		
11	that the foregoing is a true record of the testimony		
12	given.		
13	I further certify I am neither financially		
14	interested in the action nor a relative or employee of		
15	any attorney or any party to this action.		
16	IN WITNESS WHEREOF, I have this date		
17	subscribed my name.		
18			
19	Dated: December 19, 2017		
20			
21	_____ Frances Barber		
22	CSR No. 13811		
23			
24			
25			

<p><b>#</b></p> <hr/> <p><b>#metoo</b> 137:13</p> <hr/> <p><b>\$</b></p> <hr/> <p><b>\$1,000</b> 16:23</p> <p><b>\$1,050</b> 27:15</p> <p><b>\$1,200</b> 27:8</p> <p><b>\$100,000</b> 18:7,11</p> <p><b>\$2</b> 49:22</p> <p><b>\$250</b> 17:12</p> <p><b>\$500</b> 16:21,22</p> <hr/> <p>-</p> <hr/> <p><b>-and</b> 82:5</p> <p><b>-tion</b> 80:22</p> <hr/> <p><b>1</b></p> <hr/> <p><b>1</b> 128:20 129:4,7 151:1</p> <p><b>1,200</b> 26:17</p> <p><b>11:46</b> 158:20</p> <p><b>11th</b> 122:25 126:14</p> <p><b>12/12/17</b> 127:22</p> <p><b>12/20</b> 126:9 128:4 150:15 151:8</p> <p><b>12/20/2016</b> 127:20</p> <p><b>130-</b> 87:17</p> <p><b>135</b> 11:23,24 12:4 18:11 20:1,12,25 21:20 22:21 27:5,19 28:16 29:25 30:21 32:15 33:20 37:8 57:17,23 79:15 87:24 99:21 143:7 152:7 154:13 156:14 157:7 158:6</p> <p><b>13th</b> 5:2 61:12</p> <p><b>14</b> 11:8</p> <p><b>1998</b> 9:4,10</p>	<p><b>2</b></p> <hr/> <p><b>20</b> 95:8 97:6</p> <p><b>2000-</b> 11:11 14:9</p> <p><b>2003</b> 15:14</p> <p><b>2004</b> 11:12 13:14</p> <p><b>2005</b> 14:25</p> <p><b>2006</b> 14:9,25</p> <p><b>2008</b> 13:15</p> <p><b>2009</b> 13:15</p> <p><b>2010</b> 11:2</p> <p><b>2011</b> 12:15</p> <p><b>2012</b> 33:7,9</p> <p><b>2015</b> 11:6 16:1 111:2</p> <p><b>2016</b> 12:15 28:17,19,20 29:6 51:1 111:2 115:2 142:5</p> <p><b>2017</b> 5:2 65:15,24</p> <p><b>20th</b> 127:9</p> <p><b>2nd</b> 126:10,23 127:3,16 128:4 151:9</p> <hr/> <p><b>3</b></p> <hr/> <p><b>3</b> 127:21</p> <hr/> <p><b>4</b></p> <hr/> <p><b>45,000</b> 26:25</p> <hr/> <p><b>6</b></p> <hr/> <p><b>6</b> 127:22</p> <hr/> <p><b>7</b></p> <hr/> <p><b>770</b> 27:4</p> <p><b>7:21</b> 127:20</p> <hr/> <p><b>8</b></p> <hr/> <p><b>840</b> 26:20</p>	<p><b>8:23</b> 127:22</p> <p><b>8:55</b> 126:23</p> <hr/> <p><b>9</b></p> <hr/> <p><b>9</b> 16:3,4</p> <hr/> <p><b>A</b></p> <hr/> <p><b>a.m.</b> 127:22 158:20</p> <p><b>absurd</b> 98:25</p> <p><b>accent</b> 14:22</p> <p><b>accepted</b> 98:2</p> <p><b>access</b> 87:14,20 90:13 101:9 102:5,9,13 104:16</p> <p><b>account</b> 102:9</p> <p><b>accounting</b> 73:7</p> <p><b>accurate</b> 95:19 143:15</p> <p><b>accused</b> 90:2 137:17</p> <p><b>ACLU</b> 13:19,21 14:4</p> <p><b>acquire</b> 73:14</p> <p><b>acted</b> 113:8</p> <p><b>acting</b> 95:4</p> <p><b>active</b> 18:12</p> <p><b>activist</b> 152:3</p> <p><b>actors</b> 137:17</p> <p><b>actual</b> 114:1</p> <p><b>adamant</b> 42:16</p> <p><b>address</b> 111:13</p> <p><b>advancing</b> 58:24</p> <p><b>advice</b> 37:14,15</p> <p><b>af-</b> 111:23</p> <p><b>affect</b> 80:1</p> <p><b>affected</b> 76:20</p> <p><b>affiliated</b> 137:2</p> <p><b>afraid</b> 69:22 87:25</p> <p><b>African</b> 20:7</p> <p><b>Afternoon</b> 148:16</p>	<p><b>agenda</b> 146:18</p> <p><b>agents</b> 137:3</p> <p><b>aggressive</b> 96:9</p> <p><b>agree</b> 38:5 97:3 128:18,19</p> <p><b>agreed</b> 150:15,18</p> <p><b>agreement</b> 25:21 26:13</p> <p><b>ahead</b> 7:13 25:23 54:1 62:6 64:20 68:4 77:9 91:14 92:11,13,22 93:3,6 113:24 119:2,9 125:6</p> <p><b>alcohol</b> 8:9</p> <p><b>allegations</b> 114:20 131:17 137:11 138:3</p> <p><b>alleged</b> 62:10 78:11</p> <p><b>alleging</b> 56:12,21</p> <p><b>alumni</b> 15:8</p> <p><b>ambiguous</b> 105:7 138:17 157:14</p> <p><b>amount</b> 18:11 27:25</p> <p><b>amounts</b> 21:24</p> <p><b>Anabel</b> 30:6,7 37:16,18,23 39:1,3,9,25 40:4,16,17 41:24,25 42:4,5,10,11,23 43:4,13,14 44:3,9 45:4,5,10 46:11 52:18,20 53:5,19 56:6,7,10,24,25 57:2,11,16, 22 70:14 79:7,12,14,18 80:1 82:18,20,24 83:10 87:13 88:3,9 89:2,8 90:12 105:23 107:16 108:16 109:11,14 112:5,9,20 113:7 114:5,8,16 115:5 118:20 119:18 121:9, 14,16 122:15,21 130:1 134:13 135:3,10,25 138:24 139:3,6 142:15 151:18</p> <p><b>Anabel's</b> 40:13 78:25 86:6 87:3,17 99:21 112:14 125:17</p> <p><b>Andrew</b> 34:9,11,23</p> <p><b>anniversary</b> 122:16</p> <p><b>answering</b> 76:1 77:10</p> <p><b>answers</b> 91:9,24</p> <p><b>anymore</b> 101:8 102:20 103:15</p>
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