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3 **A.** I already answered. Can you repeat what I
4 answered?

5 **MR. RIVERA-SOTO:** No, you didn't answer
6 that question.

7 **THE WITNESS:** I don't recall that.

8 **MR. RIVERA-SOTO:** Okay. He doesn't
9 recall. Keep going. Let's see just how dumb he
10 can be.

11 **MR. SCHLAFLY:** I object to that.

12 **MR. MENA:** Excuse me.

13 **MR. SCHLAFLY:** That's inappropriate.

14 **MR. MENA:** This is disrespectful.

15 **MR. SCHLAFLY:** Apologize or we may
16 adjourn this deposition.

17 **MR. RIVERA-SOTO:** Not if he's earned it.
18 There's no apology coming.

19 **MR. SCHLAFLY:** You don't you insult a
20 witness like that.

21 **MR. RIVERA-SOTO:** There's no apology
22 coming.

23 **MR. SCHLAFLY:** Well, we're going to
24 adjourn the deposition if you insult him again. You
25 do it again, we're going to adjourn the deposition.

1 MR. RIVERA-SOTO: Well, tell him not to
2 earn it.

3 **THE WITNESS:** I came at a sign of
4 respect. And I've been respectful.

5 MR. RIVERA-SOTO: No, you're not here
6 out of respect. You're here by court order.

7 **MR. SCHLAFLY:** Listen --

8 MR. RIVERA-SOTO: That's why you're
9 here.

10 **MR. SCHLAFLY:** Listen, it's
11 inappropriate for you to be badgering the witness
12 anyway. Why are you even talking at this deposition?

13 MR. RIVERA-SOTO: I'm counsel of record.

14 **MR. SCHLAFLY:** It doesn't matter.

15 MR. RIVERA-SOTO: I'm counsel of record.

16 **MR. SCHLAFLY:** You don't tag-team a
17 witness.

18 MR. RIVERA-SOTO: Says who?

19 **MR. SCHLAFLY:** You shouldn't even be
20 speaking at this deposition.

21 MR. RIVERA-SOTO: Says who? Where did
22 you get that rule from?

23 **THE WITNESS:** Customary federal rules
24 say only one person --

25 MR. RIVERA-SOTO: Where did you get that

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1 rule?

2 **MR. SCHLAFLY:** It's custom.

3 **MR. RIVERA-SOTO:** I'm sorry, show me
4 where that rule is.

5 **MR. SCHLAFLY:** You want me to call the
6 Court?

7 **MR. RIVERA-SOTO:** No. I want you to
8 show me where the rule is.

9 **MR. SCHLAFLY:** I'll call the Court.

10 **MR. RIVERA-SOTO:** Call the Court.

11 **MR. SCHLAFLY:** Only one attorney --

12 **MR. RIVERA-SOTO:** Call the Court.

13 Here's a phone right here.

14 **MR. SCHLAFLY:** -- asks questions. Do
15 not tag-team the witness.

16 **MR. RIVERA-SOTO:** Stop being ignorant.
17 You can call the Court.

18 **MR. SCHLAFLY:** You're insulting. It's
19 inappropriate.

20 **MR. RIVERA-SOTO:** Well, I'm sorry, I
21 always call a banana yellow.

22 **MS. JACOBS:** I would like to mark as
23 Exhibit 11 the transcript from the deposition of Dr.
24 Arora in this case.

25 (Exhibit Salas-11 marked for