

1 Q. Thank you. And, in the course of bringing on people
2 for IRP Solutions, they mention to you that they were
3 working with law enforcement; is that correct?

4 A. Yes.

5 Q. And they did mention that they were working on
6 projects for different agencies; is that correct?

7 A. I was under -- no. I was under the impression that
8 it was the New York Police Department.

9 Q. Okay. And so they indicated they were working on
10 projects with the NYPD that is correct?

11 A. Yes.

12 Q. And in the course of working on projects -- clarify
13 this is your understanding, as well. A company builds a
14 product that is encompassed within a project. Would you
15 agree with that?

16 A. Yes. But usually with a contract in place,
17 especially --

18 Q. Okay. Let me stop you right there. So you are
19 making the assumption that a contract is in place;
20 correct?

21 A. Yes.

22 Q. Okay. Thank you.

23 Ms. Bergman, did Headway initiate any type of
24 litigation against IRP Solutions for non-payment --

25 A. Yes.