

sample transcript (3)

1           IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

2                       IN AND FOR THE COUNTY OF EVERY TOWN

3

4       JANE DOE, an individual	}	
5                       Plaintiff,	}	
6               vs.	}	Case No. :
7	}	37-2015-55555555-AB-CD-EFG
8       ROE, ROE, DOE & DOE HOMEOWNERS	}	
9       ASSOCIATION; ELLEN ROE, an	}	
10      individual board of director; KENNETH	}	
11      DOE, an individual board of	}	
12      director; and DOES 1 through 100,	}	
13      INCLUSIVE,	}	
14                       Defendants.	}	

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15                       VIDEOTAPED DEPOSITION OF JANE DOE

16                               VOLUME I, PAGES 1 THROUGH 162

17                               EVERY TOWN, CALIFORNIA

18                               OCTOBER 10, 2016

22       REPORTED BY A COURT REPORTER, CSR NO. 1234,  
 23                       REGISTERED MERIT REPORTER  
 24                       CERTIFIED REALTIME REPORTER

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sample transcript (3)

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IN AND FOR THE COUNTY OF EVERY TOWN

JANE DOE, an individual  
Plaintiff,  
vs.  
ROE, ROE, DOE & DOE HOMEOWNERS  
ASSOCIATION; ELLEN ROE, an  
individual board of director; KENNETH  
DOE, an individual board of  
director; and DOES 1 through 100,  
INCLUSIVE,  
Defendants.

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} Case No. :  
} 37-2015-55555555-AB-CD-EFG  
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VIDEOTAPED DEPOSITION OF JANE DOE  
VOLUME I, PAGES 1 THROUGH 162  
EVERY TOWN, CALIFORNIA  
OCTOBER 10, 2016

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For the Plaintiff:

THE LAW GROUP  
BY: JOHN E. WILSON, ESQ.  
1234 Fake Boulevard, Suite 202  
Fake Beach, California 91932  
t. 619.555.1234  
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For the Defendants:

DOE, MOE & ROE, LLP  
BY: STEPHEN P. DOE, ESQ.  
550 West Fake Street, Suite 1100  
San Diego, California 92101  
t. 619.555.8802  
f. 619.555.6039

The Videographer: JOHN DOE

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WITNESS: JANE ROE

3

EXAMINATION

PAGE

4

BY MR. DOE

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E X H I B I T S

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EXHIBITS:

MARKED

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1

Notice of Deposition and Request for  
Production of Documents

11

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Second Amended Complaint

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Response to Form Interrogatories

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Miscellaneous documents  
produced in response to request  
for production

52

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Monday, October 10, 2016

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11:33 a.m., Every Town, California

3 sample transcript (3)  
THE VIDEOGRAPHER: The time on the record  
4 is 11:33 a.m. Today's date is October 10th, 2016.  
5 My name is John Doe with Peterson  
6 Reporting, Video & Litigation Services.  
7 The court reporter today is  
8 Bridget Roeroeroeroe of Peterson Reporting located  
9 at 530 B Street, Suite 350, San Diego, California  
10 92101.  
11 This begins the videotaped deposition of  
12 Jane Roeroeroe testifying in the matter of  
13 Jane Roeroeroe versus Roe Doe Moe Homeowners  
14 Association, et al., Case No. 37-2014-00123456  
15 consolidated with 37-2015-00056479, taken at 550  
16 West Fake Street, Suite 1100, San Diego, California.  
17 Will counsel please identify yourselves  
18 and state whom you represent.  
19 MR. DOE: Counsel for plaintiff Jane  
20 Roe.  
21 MR. ROEROE: Stephen Roeroe for  
22 defendant DOE MOE ROE Homeowners Association,  
23 Maureen Doe and Kenneth Roe.  
24 THE VIDEOGRAPHER: Thank you.  
25 The court reporter may now swear in the  
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1 witness.

2

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JANE ROE,  
Page 5

sample transcript (3)

4 having been first duly sworn, testified as follows:

5

6

EXAMINATION

7

BY MR. ROEROE:

8

Q Ms. Roe, could you please state and

9

spell your full name for the record.

10

A Jane. J-A-N-E. Roeroeroe,

11

R-O-E-R-O-E-R-O-E.

12

Q And what is your date of birth?

13

A 8/13/57.

14

Q And have you ever had your deposition

15

taken before?

16

A I have.

17

Q On how many occasions?

18

A Well, I know one for sure.

19

Q Okay. And when was that?

20

A That was about maybe approximately two

21

years ago?

22

Q Okay.

23

A Yeah.

24

Q So you're kind of familiar with the ground

25

rules?

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1

A No. You might want to go over them.

2

Q I was just about to say that.

3

A Sorry. Sorry.

4 Q I was about to go over them for you just  
5 as a recap.

6 A Yeah.

7 Q Despite this deposition occurring in the  
8 relatively informal setting of the office, the oath  
9 you just took is the same as if you were before a  
10 judge in a courtroom.

11 A Uh-huh.

12 Q Do you understand that?

13 A Yes, I do.

14 Q Now, although we are videotaping this  
15 deposition, the official record is from the court  
16 reporter.

17 A Uh-huh.

18 Q Everything that she types -- she's going  
19 to be typing everything that we say. So in order to  
20 assist her to do that, I will try and wait until you  
21 finish with your response before I ask my question,  
22 and if you could wait until you are giving your  
23 response for me to finish my question, it will help  
24 her. So we don't talk over one another.

25 I'm going to prompt you a couple times,

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1 although in normal conversations we'll do things  
2 like "uh-huh" and "huh-uh," that's not going to read  
3 very well in a transcript. So I might prompt you to  
4 say yes or no. It's going to happen. Everybody

sample transcript (3)

5 does it.

6 A Uh-huh.

7 Q If you don't understand any question I  
8 might ask --

9 A Uh-huh.

10 Q -- please ask me to clarify. I'm sure at  
11 some point I will ask something in a way --

12 A Yeah.

13 Q -- that you don't quite understand.

14 After this deposition is completed, the --  
15 everything that we say is going to be typed up in a  
16 transcript. It's going to appear kind of like a  
17 booklet.

18 A Uh-huh.

19 Q You'll have an opportunity to make any  
20 changes that you think are necessary, but I will  
21 caution you, any significant changes, such as "red  
22 light" to "green light," "yes" to "no," if it's  
23 something significant, I can comment upon that at  
24 trial.

25 Do you understand?

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1 A I do. Yes. Yes.

2 Q And lastly, we're entitled to  
3 approximations and estimates, and that differs from  
4 complete guesses.



sample transcript (3)

5                   Just as an example, the most common one we  
6 give is if I ask you to estimate the length of this  
7 table, based on your experience with measurements  
8 and other tables, you could give me a rough  
9 approximation on how long it is.

10                   But if I asked you to tell me how large  
11 the table is in the other conference room, you would  
12 have no idea because you haven't seen it before.  
13 That would be a guess.

14                   Do you understand?

15           A     Yes, I do.

16           Q     Is there any reason that you can't give  
17 your best testimony today? Any medication or  
18 alcohol?

19           A     No.

20           Q     Okay. Have you reviewed any documents in  
21 preparation for the deposition?

22           A     Yes.

23           Q     And what did you review?

24           A     Documents pertaining to my case.

25           Q     Thank you.

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1                   Today's date is October 10. The time is  
2 3:51 p.m. Off the record.

3                   (Whereupon, the deposition was adjourned  
4 at 3:51 p.m.)

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sample transcript (3)

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1 I, JANE DOE, declare under  
2 penalty of perjury under the laws of the State of  
3 California that the foregoing is true and correct;  
4 that I have read my deposition and have made the  
5 necessary corrections, additions or changes to my  
6 answers I deem necessary.

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Executed on this \_\_\_\_\_ day of \_\_\_\_\_,  
2016.

\_\_\_\_\_  
JANE DOE

Peterson Reporting, Video & Litigation Services

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C E R T I F I C A T E

I, BRIDGET L. ROEROEROE, Certified Shorthand  
Reporter for the State of California, do hereby  
certify:

sample transcript (3)

7 That the witness in the foregoing deposition was by  
8 me first duly sworn to testify to the truth, the  
9 whole truth and nothing but the truth in the  
10 foregoing cause; that the deposition was taken by me  
11 in machine shorthand and later transcribed into  
12 typewriting, under my direction, and that the  
13 foregoing contains a true record of the testimony of  
14 the witness.

15

16 Dated: This day of October, 2016,

17 at Every Town, California.

18

19

20

21

22

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BRIDGET L. ROEROEROE

23

C. S. R. NO. 1234, RPR, CRR, RMR

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