	SUPERIOR COURT OF THE STATE OF CALIFORNIA	1	APPEARANCES OF COUNSEL (CONTINUED):
	COUNTY OF LOS ANGELES, CENTRAL CIVIL WEST	2	
-		3	FOR THE DEFENDANT PACIFIC BELL TELEPHONE CO
]	IN RE PELLICANO CASES )	4	
	)	5	EAGAN O'MALLEY & AVENATTI, LLP
4	ANITA BUSCH, )	6	BY: JASON M. FRANK, ESQ.
	Plaintiff, )Case No.	7	450 Newport Center Drive
	vs. )BC316 318	8	Second Floor
	ANTHONY PELLICANO; ALEXANDER )[Related to BC3164	59, 9	Newport Beach, California 92660
]	PROCTOR; MARK ARNESON; CITY )BC349590, BC350832	, 10	(949) 706-7000
(	OF LOS ANGELES; SBC )BC354840, BC356529,	11	jfrank@eoalaw.com
	TELECOMMUNICATIONS, INC., )BC356722, BC358270,	12	
1	formerly operating as Pacific )BC358271, BC361319,	13	FOR THE DEFENDANT MICHAEL S. OVITZ:
]	Bell Telephone Company, a )BC361624]	14	
(	corporation; CLIENT DOE; LAW )VOLUME II	15	BROWNE WOODS GEORGE LLP
]	FIRM DOE; and DOES 1 through )	16	BY: ERIC M. GEORGE, ESQ.
	100, Inclusive, )	17	AMANDA MORGAN, ESQ.
	Defendants. )	18	2121 Avenue of the Stars
		19	24th Floor
(	Continued Videotaped Deposition of ANITA BUSCH,	20	Los Angeles, California 90067
	taken at 2121 Avenue of the Stars, Los Angeles,	21	(310) 274-7100
(	California, commencing at 9:22 A.M., Thursday,	22	egeorge@bwgfirm.com
_	July 21, 2011, before Cathryn L. Baker, CSR No. 7695.	23	
		24	
]	PAGES 164 - 361	25	
	Page 164		Page 166
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4	FOR THE FLAINTIFF ANTIA DUSCH.	4	TOK THE DEI ENDANT GORRT METER & RODD, EI
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1	A. He would have asked about it. He would	1	right after the indictments is when I found out.
2	have asked me to send.	2	To my knowledge, Mike had hired his
3	Q. You say would have, did he or do you	3	private investigator was a guy name Gavin de
4	A. Oh, yeah. I would have sent him	4	Becker. So I didn't know there was any
5	something. 10:22AM	5	connection whatsoever. 10:24AM
б	Q. Again, the closest recollection that you	6	Q. When did you you said it was after
7	have about the actual words he used, can you	7	the indictments?
8	tell me what happened?	8	A. Oh, yeah.
9	A. Well, he probably would have I don't	9	Q. Give me a time period.
10	know. I mean probably called and said, "Do 10:22Al	1 10	A. Well, it was when the it was when the 10:24AM
11	you have those articles?" And I said, "yeah,"	11	New York Times articles came out. So it would
12	and I sent them to him. Basically it.	12	have had to have been after the indictments
13	Q. Why were you discussing Michael Ovitz	13	because I was I was thinking Jules. So it
14	with Stan Ornellas?	14	had to be when I saw the articles in the New
15	A. I wasn't discussing that. I was 10:22AM	15	York Times, I remember going, what? And then it 10:24AM
16	discussing he was asking me about a whole	16	was that's when I realized that Mike Ovitz
17	bunch of people.	17	had a relationship even with Anthony Pellicano.
18	Q. Including Michael Ovitz?	18	Q. Before then before the indictments
19	A. Yeah. A whole bunch of people. A whole	19	were handed down, you didn't know that Michael
20	bunch. 10:22AM	20	Ovitz had a relationship with Pellicano? 10:24AM
21	Q. Do you remember what he asked you	21	MR. HERZOG: She said before the New
22	A. He asked me about the newspaper too.	22	York Times articles.
23	Q. Do you remember what he asked you about	23	THE WITNESS: Before I didn't know
24	Michael Ovitz?	24	no, before the New York Times article was after
25	A. He asked me what kind of relationship I 10:22AM	25	the indictment. 10:25AM
	Page 212		Page 214
1	1 1 111	-	DV MD GEODGE
1	had with him.	1	BY MR. GEORGE:
2	Q. Do you remember what you said?	2	Q. Right. You're talking about the New
3	A. I had a good relationship with him.	3	York Times articles that referenced the
4	Q. Do you remember when this conversation	4	indictments?
5	occurred? 10:22AM	5	A. No. The New York Times articles 10:25AM
6	A. It would have occurred around this time	6	well, yeah, maybe they did. I don't remember.
7	frame. I remember saying that I had he	7	I just remember they were about Mike and I had
8	invited me to his Bar Mitzva, his kid's Bar	8	no idea that I thought Mike worked with Gavin
9	Mitzvah. We had a pretty good relationship.	9	de Becker. I had no idea that he had any
10	Q. And in mid-2003, about the time that 10:23AM	10	relationship whatsoever to Anthony Pellicano. 10:25AM
11	these articles were sent, did you have any	11	It was, like, shocking.
12	additional conversations about Michael Ovitz	12	Q. So just so I'm clear. It was only after
13	with Stan Ornellas?	13	you learned about the indictments being handed
14	A. No. He just wanted to know what kind of	14	down
15	relationship I had with him. I told him it was 10:23AM	15 16	MR. HERZOG: That's not what she said. 10:25AM
16	a good one. And sent some articles of stuff	16	After the New York Times articles.
17	that I had done previously on all sorts of	17	THE WITNESS: No, it was after the New
18	stuff, and it didn't seem to matter much.	18	York Times articles.
19	Q. Did he suggest at any point at any	19	BY MR. GEORGE: 0. Which New York Times articles? 10:25 AM
20	point in the year 2003 did you suggest to Stan 10:23A	_	Q. Which New York Times articles? 10:25AM
21	Ornellas that Michael Ovitz might be responsible	21	A. Those appeared after the indictments.
22	for Anthony Pellicano's actions against you?	22	Q. Right. Were those the articles that
23	A. No. Because there was no connection between Michael Ovitz and Pellicano. I didn't	23	referenced the indictments? You don't know?
	netween Witchael UVITZ and Pellicano I didn't	24	A. I don't know if they referenced the
24		25	-
24	know about that until much later. It was like 10:23AM Page 213	25	indictments, but they were about people's 10:25AM Page 215

Pages 212 to 215

21it was real close to that time because I was21THE WITNESS: Yeah, so it was during22still thinking it was Jules at that time.22that it was after that.23MR. FRANK: Okay. Thank you.23MR. GEORGE: But hang tight. Go for it.24THE WITNESS: I was waiting for Jules to24(The record was read by the25be indicted. I didn't know the investigation10:26AM25reporter as follows:10:28AMPage 2161was still going on. I thought there was going1"Question: Is this the first2to be more indictments. I was waiting to see.2time you had any suspicion, in3And then the New York Times articles came out3other words, after February 2006,4and I was, like, "What the hell is this?"4that Michael might be responsible5BY MR. GEORGE:10:26AM5for Anthony Pellicano doing this to6Q. So that I'm clear. So February 20066you?")7indictments, New York Times piece after February7BY MR. GEORGE:82006, and then it crystalizes in your mind,8Q. So is your answer yes?9first of all9A. Say that again. Let me make sure that I	1		-	
3       had admitted to hiring Pellicano. And 1 was       3       Pellicano doing this to yon?         4       like what? Because he I always fhought his       4       A. Well, after 1 realized that he did hare       10.27AM         6       That's all 1 had heard that he had used was       6       his total thag, then 1 started going backwards in       10.27AM         7       Gavin de Becker, 1 just didn't think that Mike       6       his total thag, then 1 started going backwards in       10.27AM         8       would associate himself with a thug like Ambony       8       ime and going, okay. Well, this, and then       10.28AM         11       go, and that was the very first time that       10226AM       10       of - yeah, it crystalized. 1 was like1       10.28AM         12       A. Yeah.       11       of - yeah, it crystalized. 1 was was like1       10.28AM         13       Q. And that was because of the New York       13       What the hell is this? What do you mean?"       10.28AM         14       Times piece that came out?       14       Q. Foljust like to have my question read       back so we can have a specific focus.       10.28AM         13       O, Son yaving if was during the function?       10       C. Kore was call that had like as during       10.28AM         14       Times declose that time because I was       17 <td></td> <td></td> <td></td> <td>· · · · ·</td>				· · · · ·
4       like what? Because he - I always fought his       4       A. Well, after I realized that he did have         5       private investigator was Gavin de Becker.       10:26AM       5       a relationship with the guy, and he did have         7       Gavin de Becker.       1yast fidht think that Mike       7       would associate himself with a thug like Anthony       6       this total thag, then I started going back. It         9       Pelicano.       9       that, and I started like realizing what what         10       Q. And that was beever first time that       10:26AM       0       all this started yoing back. It         11       of yeah, it crystalized. I was like I       10:28AM         12       A. Yeah.       12       looked at that and I wast started. I wast like I         13       Q. And that was because of the New York       13       of yeah, it crystalized. I was like I         14       Times piece that came out?       14       Q. Fd just like to have my question read         14       Wast masafed in a public coord in february of       16       crystalize. She dit use         13       Q. Yadi, there was output of them read was the read was a specific focus.       10:28AM         14       Wast masafed in a public record in february of       16       crystalize. She dit use         14		-		
5       private investigator was Gavin de Recker.       10:26AM       5       a relationship with the guy, and be did her       10:27AM         6       That's all had heard that hend used was       6       this total flug, then I started going back. It         7       Gavin de Becker, I just didn't think that Mike       7       was like over time, I started like realizing what – what         10       Q. And that was the very first time that       10:26AM       10       all this stuff was adding up to. But it kind       10:28AM         11       you realized that?       10       of – yeah, it crystalized. I was like – 1       10:28AM         12       A. Yeah.       12       looked at that and I was stumed. And I went,       10         13       Q. And that was because of the New York       13       "What the bell is this? What do your mean?"       10:28AM         14       Times piece that came on?       16       A. Sorry.       MR. HRANK: Ms. Busch, the indicaments       17         15       A. Yeah, there was a couple of them. Yeah.       10:26AM       18       erystalize. She did use –       10:28AM         16       Was real close to that time bcause I was       21       THE WITNESS: Yeah, it was more that think, was after that time?       19       MR. GEORGE: But hang think, of to fail the real that and I was after that time?       10: hare it was after that time?		<u> </u>		
6       Thark all had head used was       6       this total thug, then I surfed going back. It         7       Gavin de Becker. I just didn't think that Mike       7       was like over time. I started going backwards in         8       would associate himself with a thug like Anthony       9       time and going, oksy. Well, this, and then         9       Pellicano.       9       that, and I started like realizing what - what         11       op. And that was hevery first time that 10:26AM       10       11       dist Was able over time. I started going backwards in         12       A. Yeah.       11       0       And that was hevery first time that 10:26AM       10       11       dist Was able over time. I started going backwards in         13       Q. And that was because of the New York       11       10       14       Times piece that came ont?       14       10.00xed at that and I was started that the 10: shifts' What do you mean?''         14       Times piece that came ont?       10       10       A. Sorry.       10:28AM         15       A. Yeah, here was a couple of them. Yeah.       10:28AM       10:28AM       10:28AM         16       M. FRANK, M. Sky Buch, the indictments       12       10       that = it was after that         16       M. Starting if was Jules at that time?       12       that. It was after				
7       Gavin de Becker. I just didn't hink that Milie       7       was like over time. I started ejnej backwards in         8       would associate himself with a thug like Anthony       8       time and going, okay. Well, this, and then         9       Pellicano.       9       that, and I started like realizing what - what         10       Q. And that was the very first time that       10:26AM       10       -yeah, it crystalized. I was like - r         11       you realized that?       10       -yeah, it crystalized. I was like - r       10:28AM         13       Q. And that was because of the New York       13       "What the hell is this? What doy on men?"         14       Times piece that came out?       14       Q. For J just like to have my question read         15       A. Yeah, there was a couple of them, Yeah.       10:26AM       16       A. Sory.         13       2006, are yea sing it was differ that inte?       19       MR. GEORGE: I khow she did, but I want         16       Was used for that time?       19       MR. GEORGE: Khow she did, but I want         17       THE WTINESS: Yeah, it was differ that time?       10:26AM       20         18       was a lides at that time?       21       THE WTINESS: Yeah, so it was during that was				
8       would associate himself with a thug like Anthony       8       time and going, okay. Well, this, and then         9       Pellicano.       9       that, and I started like realizing what – what         10       Q. And that was the very first time that       10:22AM       10       althis staff was adding up to. But it kind       10:23AM         11       you realized that?       11       of – yeah, it crystalized. I was like – I       10:28AM         12       A. Yeah.       12       looked at that and I was stumed. And I went.       10:28AM         13       Q. And that was because of the New York       11       "What the hell is this? What do you mean?"         14       Times piece that came out?       14       Q. I'd just like to have my question read       10:28AM         14       Q. So were going to find those.       16       crystalize. She did us e –       10:28AM         15       vace wasadia na public record in February of       16       crystalize. She did us e –       MR. GEORGE: I know she did, but I want to have start started in kery starter that ime?         16       twas was alea in a buits word       21       THE WTNESS: Yeah, swa publica to 22       MR. GEORGE: I know she did, but I want to have starter that.         17       MR. FRANK: Oke, Want have publica to 22       MR. GEORGE: But hang tight. Go for i.       (The record was read by the </td <td></td> <td></td> <td></td> <td></td>				
9       Pellicano.       9       that, and I starred like realizing what - what         10       Q. And that was the very first time that 10:26AM       10       all this stuff was adding up to. But it kind       10:28AM         11       of - yeah, it crystalized. I was stunned. And I wear, it was because of the New York       12       looked at that and I was stunned. And I wear, it was because of them. Yeah. 10:26AM       15       A. Yeah, there was a couple of them. Yeah. 10:26AM       16       A. Sory.       10:28AM         13       Q. And that was because of the wear of the moduli reflexions of the indictments       17       MR. HERADS: M.B. Busch, the indictments       17       MR. HERADS: M.B. Busch, the indictments       17       MR. HERADS: M.S. Start, at was probably = 10:26AM       10:22AM		•		
10       Q. And that was the very first time that       10:26AM       10       all this suff was adding up to a But it kind       10:28AM         11       you realized that?       11       of yeah, it crystalized. I was tilke - I         12       A. Yeah.       12       looked at that and I was stunned. And I vent,         13       Q. And that was because of the New York       13       "What the hell is this?" What due holl is this?" What due holl is this?" What due holl is this?" What due hell is this?" What the hell is this?" Hank you       10:28AM         13       were unsealed in a public record in February of       12       10       A. Story.       If the WITNESS: Yeah, it was probably -1       10:26AM       20       the vere that.       12       10:28AM         14       If the WITNESS: Yeah, it was probably -1       10:26AM       21       THE WITNESS: Yeah, was probably -1       10:26AM       21       THE WITNESS: Yeah, was group the public record was read by the       12       10:28AM       10:28AM         15       be indicted. I				
11       ofyeah, it crystalized. I was like - I         12       A. Yeah.       12         13       Q. And that was because of the New York.       13         14       Times piece that came out?       14         15       A. Yeah, there was a couple of them. Yeah. 10:26AM       15         16       Q. So we're going to find those.       16         17       MR. FRANK: MS. Busch, the indiciments       17         18       were massed in a public record in February of       18         2006, are you saying it was after that time?       19       MR. GEORGE: I know she did, but I want         2006, are you saying it was after that time?       10       that were question read back. Thank you.       10:28AM         21       it was real close to that time because I was       21       thit with the Sit was during       10:28AM         22       rull thinking it was jubes at that time?       23       MR. GEORGE: But hang tight. Go for it.       24         23       MR. PRANK: Okay. Thank you.       23       MR. GEORGE: But hang tight. Go for it.       25         24       THE WTINESS: Trawa witing for Jules to       24       rule that was dift first       10:28AM         25       be indicted. I didn't know - the investigation       10:26AM       25       reporter as follows:				Ū.
12       A. Yeah.       12       looked at that and I was stunned. And I went,         13       Q. And that was because of the New York       13       "What the hell is this?" Mand to you mean?"         14       Times pice that came out?       14       Q. P d just like to have my question read         15       A. Yeah, there was a couple of them. Yeah. 10:26AM       15       back so we can have a specific focus.       10:28AM         16       M. REANK: M. Subsch, the indictments       16       A. Sorry.       MR. HEZZOG: I think she used your word         17       MR. REANK: M. Subsch, the indictments       17       MR. GEORGE: I know she did, but I want         10       orget as after that time?       19       MR. GEORGE: I know she did, but I want         10       trike WITNESS: Yeah, it was probably -0       10:26AM       20         11       was after that time?       21       that it was after that.         12       tim was real close to that time?       23       MR. GEORGE: But hang tight. Go for it.         12       THE WITNESS: Yeah, was probably -0       24       (The record was read by the       25       reporter as follows:       10:28AM         12       to be more indements. I was waiting to sec.       2       1       "Question: Is this the first       10:27AM         13				
13       Q. And that was because of the New York       13       "What the hell is this? What do you mean?"         14       Times piece that came out?       14       Q. Pd just like to have my question read         15       A. Yeah, there was a couple of them. Yeah. 10:26AM       15       back so we can have a specific focus.       10:28AM         16       A. Sorry.       16       A. Sorry.       17       MR. HERZOG: I think she used your word         18       were unsealed in a public record in February of       18       crystalize. She did use -       19         2006, me you saying it was after that time?       19       MR. GEORGE: I think she used your word       10:28AM         21       if was read close to that time because I was       21       the was read back. Thank you.       10:28AM         22       thatit was after that.       23       MR. GEORGE: But hang tight. Go for it.       24         23       MIR. FRANK: Oks, Thank you.       24       thatit was after that.       25         24       THE WITNESS: I was waiting to sub.       24       thatit was after that.       28         25       be indicted. I didn't know - the investigation       10:26AM       25       reporter as follows:       10:28AM         26       the more indements. I was waiting to see.       2       time yo				
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	25			5
		Page 217		

Pages 216 to 219

1	A. Yes.	1	vertigo. It's from the pressure probably.
2	Q. Did you use all three telephone lines or	2	BY MR. FRANK:
3	just the two?	3	Q. Do you need to take a break?
4	A. I used the third one too.	4	A. No, I'm okay.
5	Q. You actually made 02:00PM	5	Q. Let me ask the question again. How did 02:02PM
б	A. I may have	6	you determine that the relevant time period of
7	Q telephone calls on that line?	7	the wiretapping began in April or May of 2002?
8	A. It was mainly fax.	8	A. Well, Pellicano was involved during that
9	Q. It was mainly fax?	9	time frame, so I figured it was you know.
10	A. Yeah. 02:00PM	10	Q. And you figured that it ended in 02:02PM
11	Q. Okay.	11	November of 2002 because that's when
12	But you're certain that you used the	12	A. The phone company told me that.
13	other two lines both for your work as a	13	Q. The phone company told you that the
14	journalist and to make personal calls, correct?	14	wiretap was removed in November 2002?
15	A. Yes. 02:00PM	<mark>15</mark>	A. Yeah. 02:02PM
16	Q. In the course of your work as a	16	Q. And the phone company told you that
17	journalist, would you call your sources from	17	there was a wiretap in place?
18	your landline?	18	A. They didn't use that word. They used
19	A. Yes.	19	half-tap I think, or part-tap, something like
20	Q. When I say your landline, I'm going to 02:00PM	20	that. 02:02PM
21	refer to these landlines	21	Q. But you understood that to mean,
22	A. I understand.	22	essentially mean, a wiretap, correct?
23	Q is that understood?	23	A. I had to ask questions, but then I found
24	A. Yes.	24	out what it was, yes.
25	Q. Were your sources located in the 323 02:00PM	25	Q. In November 2002 you understood that to 02:02PM
	Q. Were your sources iscured in the sac		
	Page 304		Page 306
	Page 304		Page 306
1		1	
1 _2	area code?	1	mean a wiretap, correct?
2	area code? A. They were located in all area codes.	2	mean a wiretap, correct?
2 3	<ul><li>area code?</li><li>A. They were located in all area codes.</li><li>Q. And it's correct that the telephone</li></ul>	<mark>2</mark> 3	mean a wiretap, correct?         A. Yes.         Q. I want to if you look at the fifth
2 3 4	<ul> <li>area code?</li> <li>A. They were located in all area codes.</li> <li>Q. And it's correct that the telephone</li> <li>service provider for your landlines was Pacific</li> </ul>	<mark>2</mark> 3 4	mean a wiretap, correct?         A. Yes.         Q. I want to if you look at the fifth         paragraph, it says, ''I would estimate that I
2 3 4 5	area code?A. They were located in all area codes.Q. And it's correct that the telephoneservice provider for your landlines was PacificBell Telephone Company?02:01PM	2 3 4 5	mean a wiretap, correct?         A. Yes.         Q. I want to if you look at the fifth         paragraph, it says, ''I would estimate that I         made at least 190 to 200 calls per week to other       02:03PM
2 3 4 5 6	area code?A. They were located in all area codes.Q. And it's correct that the telephoneservice provider for your landlines was PacificBell Telephone Company?A. Yes.	<mark>2</mark> 3 4 5 6	mean a wiretap, correct?         A. Yes.         Q. I want to if you look at the fifth paragraph, it says, "I would estimate that I made at least 190 to 200 calls per week to other 02:03PM California residents using the telephone lines
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Pages 304 to 307

1		1	DV MD EDANK.
2	it always outside a certain mile range or what?	1	BY MR. FRANK:
2	Q. As I said, my understanding is that	2	Q. You can keep that here.
3 4	depending on the distance from your home to the call that you're making, will reflect if you're	3 4	Do you have Exhibit No. 45 in front of you?
5	going to be billed for the call or not. 02:45PM	5	A. Okay. 02:47PM
6	A. But what is the mile do you know what	6	Q. Exhibit No. 45 is an article in the Los
7	the mile range is?	7	Angeles Times headlined "Pellicano Accused of
8	Q. I don't. I believe it's somewhere	8	Wiretapping'' byline Dave Rosenzweig.
9	between 8 to 12 miles, but I can't say that for	9	A. Uh-huh.
10	sure. 02:45PM	10	Q. Do you know Dave Rosenzweig? 02:47PM
11	A. No, it can't be, because Dave is closer	11	A. Yes, I knew him.
12	than that.	12	Q. Did you work with him?
13	Q. And Dave's number appears on these	13	A. Yes. He passed.
14	bills?	14	Q. I'm sorry to hear that.
15	A. No, it's not on here. 02:45PM	15	I understand you may not have seen it in 02:47PM
16	Q. Right. If it's closer then it would not	16	this format because this is a LexisNexis
17	appear on your telephone bills.	17	printout, but have you seen this article before?
18	A. Okay.	18	A. I don't remember reading this, no.
19	Q. Looking at the chart, you'll see that	19	Honestly, I don't remember reading it.
20	there's a number of calls that only last one 02:45PM	20	Q. Did you have a subscription to the Los 02:48PM
21	minute in duration?	21	Angeles Times
22	A. Uh-huh.	22	A. No.
23	Q. Yes?	23	Q in 2003?
24	A. Yes.	24	You got to wait until I finish my
25	Q. You've had the experience, I assume, of 02:45PM	<b>1</b> 25	question. 02:48PM
	Page 344		Page 346
1	calling someone and getting their answering	1	Did you have a subscription to the Los
2	machine or voicemail, correct?		Did you have a subscription to the Los
		2	Angeles Times in 2003?
3		2	Angeles Times in 2003?
3 4	A. Of leaving a message, uh-huh.	3	A. I don't believe so.
4	<ul><li>A. Of leaving a message, uh-huh.</li><li>Q. Looking at any of these calls that are</li></ul>	3 4	<ul><li>A. I don't believe so.</li><li>Q. Were you working for the Los Angeles</li></ul>
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4 5	<ul> <li>A. Of leaving a message, uh-huh.</li> <li>Q. Looking at any of these calls that are one minute or less in duration, can you tell me 02:46P! if the call is a call in which you actually</li> </ul>	3 4 AI 5	<ul> <li>A. I don't believe so.</li> <li>Q. Were you working for the Los Angeles</li> <li>Times in 2003? 02:48PM</li> <li>A. Yes.</li> </ul>
4 5 6	<ul> <li>A. Of leaving a message, uh-huh.</li> <li>Q. Looking at any of these calls that are</li> <li>one minute or less in duration, can you tell me 02:46P1</li> </ul>	3 4 11 5 6	<ul> <li>A. I don't believe so.</li> <li>Q. Were you working for the Los Angeles</li> <li>Times in 2003? 02:48PM</li> </ul>
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Pages 344 to 347

1	Q. Can you turn to page 1673. And if you	1	A. Yes.
2	refer to the middle of the page it says,	2	Q. You'll see approximately half the page,
3	"Writing her personal notes, Anita describes the	3	about the fifth entry or sixth entry up from the
4	experience saying": And then it purports to	4	bottom, it's an article written by Dave
5	quote from your notes. 02:49PM	5	Rosenzweig? 02:53PM
6	If you can read those notes and tell me	6	A. Yes, I see that.
7	if those appear to be an accurate reflection of	7	Q. Any reason to believe that you did not
8	your notes?	8	provide this article to Mr. Moldea?
9	A. They weren't personal notes. This is	9	A. I didn't provide every article to him.
	something that I would have told him. (02:50PM)	10	He got things on his own. 02:53PM
1	Q. So this is something you told	11	MR. FRANK: I'll mark as the next
2	A. I probably yeah.	12	Exhibit 46.
3	Q Mr. Moldea?	13	(Deposition Exhibit 46 was marked for
4	A. Yeah. I didn't write anything down. I	14	identification.)
.5	didn't have personal notes on this. I remember 02:50PM	15	BY MR. FRANK: 02:53PM
6	this now.	16	Q. I'll represent to you, if you see the
10 17	<b>Q.</b> Does this accurately reflect what you	17	Bates stamp on the bottom 1310, this is a
8	told Mr. Moldea?	18	document that you produced to us in this
. 0 . 9	MR. HERZOG: You got to read it. It	19	lawsuit.
20	goes over for many, many pages, so I don't know 02:50Pl		MR. HERZOG: Do we have a copy? 02:53Pl
		_	17
1	(how far) BY MR. FRANK:	21	BY MR. FRANK:
22		22 23	Q. Is this a document that you produced in
23	Q. Just read for just 274.		this lawsuit?
24	A. No, it's not accurate.	24	A. I guess so.
25	Q. Please tell me what's not accurate. 02:50PM Page 348	25	Q. This is a document that was in your 02:54PN Page 350
1	A. The questioning by Dan Saunders that I	1	records?
2	A. The questioning by Dan Saunders that I realized my phones were illegally wiretapped and (the confirmation. That did not that was not)	1 2 3	records? A. Probably, yes. <b>O. And the date of this article is March</b>
2 3	realized my phones were illegally wiretapped and	2	A. Probably, yes.
2 3 4	realized my phones were illegally wiretapped and (the confirmation. That did not that was not (the confirmation that it was illegally)	2 3	<ul><li>A. Probably, yes.</li><li>Q. And the date of this article is March</li></ul>
2 3 4 5	(realized my phones were illegally wiretapped and the confirmation. That did not that was not (the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not.) 02:50PM	2 3 4	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> </ul>
2 3 4 5 6	(realized my phones were illegally wiretapped and the confirmation. That did not that was not (the confirmation that it was illegally) (wiretapped at all. Not at all. Absolutely not.) (02:50PM) (I knew they were investigating my phones. I)	2 3 4 5	<ul><li>A. Probably, yes.</li><li>Q. And the date of this article is March 13th, 2003?</li></ul>
2 3 4 5 6 7	(realized my phones were illegally wiretapped and the confirmation. That did not that was not (the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not.) 02:50PM	2 3 4 5 6	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> </ul>
2 3 4 5 6	<ul> <li>(realized my phones were illegally wiretapped and the confirmation. That did not that was not the confirmation that it was illegally</li> <li>(02:50PM)</li> <li>(02:50PM)<!--</th--><th>2 3 4 5 6 7</th><th><ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> </ul></th></li></ul>	2 3 4 5 6 7	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> </ul>
2 3 4 5 6 7 8 9	(realized my phones were illegally wiretapped and the confirmation. That did not that was not the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not. 02:50PM I knew they were investigating my phones. I knew they were investigating my phones. Q. Is there anything else inaccurate in	2 3 4 5 6 7 8	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> <li>Q. Where in your records did you find it?</li> <li>A. What?</li> </ul>
2 3 4 5 6 7 8	realized my phones were illegally wiretapped and the confirmation. That did not that was not the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not. 02:50PM I knew they were investigating my phones. I knew they were investigating my phones. Q. Is there anything else inaccurate in this section?	2 3 5 7 8 9	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> <li>Q. Where in your records did you find it?</li> <li>A. What?</li> </ul>
2 3 4 5 6 7 8 9	<pre>(realized my phones were illegally wiretapped and the confirmation. That did not that was not the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not. 02:50PM I knew they were investigating my phones. I knew they were investigating my phones. Q. Is there anything else inaccurate in this section? A. I don't remember anybody asking me what 02:51PM</pre>	2 3 4 5 6 7 8 9 10	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> <li>Q. Where in your records did you find it?</li> <li>A. What?</li> <li>Q. Where in your records did you find this 02:54P</li> </ul>
2 3 4 5 6 7 8 9 L0	<pre>(realized my phones were illegally wiretapped and the confirmation. That did not that was not (the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not. 02:50PM I knew they were investigating my phones. I knew they were investigating my phones. Q. Is there anything else inaccurate in this section? A. I don't remember anybody asking me what 02:51PM the guy in the car looked like. I don't</pre>	2 3 4 5 6 7 8 9 10 11	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003?</li> <li>A. Uh-huh. 02:54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> <li>Q. Where in your records did you find it?</li> <li>A. What?</li> <li>Q. Where in your records did you find this 02:54P.</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<pre>(realized my phones were illegally wiretapped and the confirmation. That did not that was not the confirmation that it was illegally wiretapped at all. Not at all. Absolutely not. 02:50PM I knew they were investigating my phones. I knew they were investigating my phones. Q. Is there anything else inaccurate in this section? A. I don't remember anybody asking me what 02:51PM the guy in the car looked like. I don't remember the woman looking at me and nodding her head in sympathy. I know that happened during the trial but I don't remember that. I don't remember talking 02:52PM Q. You've already flipped the page? A. Yes. Q. Then we're fine. I'll refer you to Exhibit 27, which was the catalogue of documents from Mr. Moldea that 02:52PI he purports to have received from you. A. What number?</pre>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>A. Probably, yes.</li> <li>Q. And the date of this article is March</li> <li>13th, 2003? <ul> <li>A. Uh-huh.</li> <li>Q: 54PM</li> <li>Q. Yes?</li> <li>A. Yes.</li> </ul> </li> <li>Q. Where in your records did you find it?</li> <li>A. What?</li> <li>Q. Where in your records did you find this 02:54Pl article?</li> <li>A. Oh, I don't know. I had thrown a bunch of stuff in a box.</li> <li>Q. There was a box that had newspaper articles in it? 02:54PM</li> <li>A. Uh-huh.</li> <li>Q. Yes?</li> <li>A. Yeah.</li> <li>Q. And there's some handwriting on a box</li> <li>A. There's some handwriting on a little box.</li> </ul>

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