

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

SAMUEL A. PERRONI,

Petitioner,

vs.

MARK A. FAJARDO, M.D., ET AL,

Respondents.

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) Case No. BS159430
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DEPOSITION OF JOHN CORINA

Tuesday, May 3, 2016

9:51 A.M.

Westin Bonaventure Hotel

Room No. 3064, Blue Tower

404 South Figueroa Street

Los Angeles, CA 90071

JOB NO. 127557

REPORTED BY:

Christine Kwon-Chang

CSR No. 12143, RPR, CRR

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17 Also Present:

18 JAN MORRIS
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I N D E X

WITNESS: JOHN CORINA

EXAMINATION BY	PAGE
Mr. Perroni.....	7

EXHIBITS

EXHIBIT	DESCRIPTION	PAGE
A	Document.....	16

WITNESS INSTRUCTED NOT TO ANSWER

Page	Line
29	10
29	15
31	13
36	16
37	2
38	15
38	20
39	5
41	20
41	25
42	18
43	5
45	18
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I N D E X (CONTINUED)

WITNESS INSTRUCTED NOT TO ANSWER

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1 LOS ANGELES, CALIFORNIA;

2 TUESDAY, MAY 3, 2016, 9:51 A.M.

3

4 MR. PERRONI: Let's go on the record.

5 And why don't you swear the witness
6 first?

7

8 JOHN CORINA,

9 having been first duly sworn was examined and
10 testified as follows:

11 MR. PERRONI: All right. Before we get
12 started, counsel's entered into some stipulations
13 concerning this deposition, and I'm going to recite
14 the stipulations.

15 Hopefully, I'll get them the way we
16 agreed to them.

17 The first stipulation is objections
18 other than to the form of the question and to
19 privilege need not be made at the deposition and are
20 hereby reserved.

21 Number two, the witness and -- by the
22 way, are you representing Lieutenant Corina?

23 MS. BIRENBAUM: Yes, I am.

24 MR. PERRONI: Okay. The witness and his
25 counsel desire that he review the deposition and sign

1 the deposition, and the review and signing process is
2 to occur within ten days from the date that the court
3 reporter gets the original deposition to the witness's
4 counsel.

5 And then there will be -- if -- excuse
6 me.

7 If there are any corrections that are
8 made to the deposition, defendant's counsel will send
9 a letter to me with a copy to the court reporter
10 within five days from the ten days that the witness
11 has to review and sign the deposition.

12 Did I say that okay?

13 MS. BIRENBAUM: Yes.

14 MR. PERRONI: Okay. And then the last one is
15 if a witness -- if the witness is advised or
16 instructed not to answer the questions propounded by
17 counsel, it will be deemed that the reporter has so
18 indicated on the record and designate that question as
19 asked and refused to be answered.

20 MS. BIRENBAUM: Can you repeat what he said,
21 the last? I'm not sure I understood what he said.

22

23 (A discussion was held off

24 the record.)

25

1 MS. BIRENBAUM: I don't believe that adequately
2 reflects what we stated.

3 MR. PERRONI: Okay. You say it.

4 MS. BIRENBAUM: I would revise it to say that
5 if the witness is instructed not to answer a question,
6 the court reporter will mark that in the record, on
7 the index as well.

8 MR. PERRONI: Thank you.

9 All right. We have that.

10 MS. BIRENBAUM: So stipulated.

11

12 EXAMINATION

13 BY MR. PERRONI:

14 Q Okay. I introduced myself before this
15 deposition. My name is Sam Perroni. I'm from
16 Arkansas, and I'm the plaintiff in this case.

17 And before we get started, I wanted to
18 give you a couple kind of preliminary things.

19 As I told you before we started, I have
20 a profound hearing disability, and so I have a screen
21 in front of me where the questions and the answers
22 will come up, and periodically I may have to review
23 the screen, and so you just have to bear with me here
24 because I don't understand what people are saying
25 sometimes.

1 Next, I want to ask you if -- have you
2 ever given a deposition before?

3 A I have.

4 Q Okay. So you're familiar with the fact
5 that a deposition is just like testifying in court?

6 You're under oath subject to the penalty
7 of perjury; correct?

8 A Correct.

9 Q Okay. Finally, I'm hopeful that I will
10 be able to ask very clear, intelligent questions
11 during the course of this deposition, but if I should
12 ask you a question that you don't understand, please
13 tell me that you don't understand, and I will repeat
14 my question.

15 Is that fair enough?

16 A Very good.

17 Q Okay. The last thing is, you -- you
18 know that you have to answer a question. You can't
19 say "uh-huh" or "unh-unh" because the court reporter
20 here is trying to get down what you're saying, and
21 those don't come out on the record very well.

22 Okay?

23 A Uh-huh.

24 Q And you can't shake -- that was a trick
25 question.

1 And you can't shake your head yes or no
2 because she really can't get those down.

3 A Correct.

4 Q You got that?

5 You were raising your hand?

6 MS. BIRENBAUM: Yes. I just had a question.

7 We have one additional person sitting in
8 the room other than yourself, the witness and the
9 court reporter.

10 I'd like to ask that the extra person
11 identify herself on the record and let us know her
12 purpose for being here so that I can make a
13 determination from there.

14 MR. PERRONI: Well, I will identify her, and
15 her name is Jan Morris, and she's my assistant.

16 MS. BIRENBAUM: Okay. As long as she's not
17 here for disrupting the deposition, we're all good.

18 MR. PERRONI: No. She doesn't --

19 MS. BIRENBAUM: I have to ask. It's my job.

20 MR. PERRONI: She's here to help me.

21 MS. BIRENBAUM: It's my job to ask.

22 BY MR. PERRONI:

23 Q All right. State your full name for me,
24 please.

25 A Sure. John Corina, C-O-R-I-N-A.

1 Q And are you employed?

2 A I am.

3 Q And who do you work for?

4 A Los Angeles County of Los Angeles
5 Sheriff's Department.

6 Q How long have you worked for the
7 Sheriff's Department?

8 A Thirty-three years.

9 Q What's your position now?

10 A I'm assigned as a lieutenant for the
11 Sheriff's Department's Homicide Bureau.

12 Q How long have you been in that position?

13 A Approximately five-and-a-half years.

14 Q What did you do before that?

15 A I was assigned as a watch commander at
16 Century Sheriff's Station.

17 Q Tell me the duties and responsibilities
18 of a watch commander.

19 A Well, you're in charge -- you're in
20 charge of a shift at the Sheriff's Department's
21 station, and you're responsible for supervising the
22 field deputies and the detectives there at the station
23 and of course the patrol and policing of the
24 community -- providing services to those in the
25 community, policing services.

1 Q How long did you do that?

2 A Approximately 18 months.

3 Q Now, tell me what your duties and
4 responsibilities are in the position you hold now.

5 A Well, being assigned to the Homicide
6 Bureau, I'm in charge of a team of detectives that
7 investigate deaths, so any murders, suspicious deaths,
8 officer involved shootings, deputy involved shootings.

9 At this time I have 12 investigators
10 that I supervise.

11 Q Twelve of them?

12 A Correct.

13 Q And let's go back to when you first
14 assumed this position.

15 Who did you report to?

16 A Well, I report to the captain of the
17 bureau, the Unit Commander, referred to.

18 Q Who is that --

19 MS. BIRENBAUM: Not relevant.

20 BY MR. PERRONI:

21 Q -- at the time?

22 MS. BIRENBAUM: You can still answer.

23 THE WITNESS: That was -- the captain at the
24 unit at the time was David Smith.

25

1 BY MR. PERRONI:

2 Q David Smith?

3 A Right.

4 Q All right. And I'm trying to get a
5 little bit about the chain of command here. Okay?

6 A Sure.

7 Q All right. You reported to Captain
8 David Smith?

9 MS. BIRENBAUM: Vague as to time.

10 BY MR. PERRONI:

11 Q Let me do something here.

12 There's a little bar that is blocking my
13 answer here. Let me see. I hope I don't mess this
14 thing up.

15 Okay. You can answer the question.

16 MS. BIRENBAUM: Yes.

17 Things like "vague as to time," those
18 are the objections that you could just answer over the
19 ones I make for the record based on the form of the
20 question.

21 BY MR. PERRONI:

22 Q Do you remember the question?

23 A Yes, I do.

24 You asked who was the captain at the
25 time -- at the time --

1 Q Let me start over.

2 A Sure.

3 Q You said at the time that you were first
4 put in the position that you hold now that you
5 reported to Captain David Smith.

6 A When I first went to Homicide, yes.

7 Q When you were first appointed to the
8 position you hold now?

9 A Yes.

10 He was the captain of the position.

11 Q Captain David Smith, who did he report
12 to at the time?

13 MS. BIRENBAUM: Not relevant.

14 THE WITNESS: There was a commander above him.

15 So it goes captain, commander rank
16 structure. I do not remember the commander at the
17 time.

18 BY MR. PERRONI:

19 Q Okay. And was there a person in the
20 department at that time by the name of William
21 McSweeney?

22 A Yes.

23 Q And what was his position back at the
24 time that you were first appointed in the position
25 that you hold now?

1 A William McSweeney was a Chief in the
2 Sheriff's Department.

3 Q Of the Sheriff's Department?

4 A In the Sheriff's Department there's a
5 number of Chiefs. He was one of them.

6 Q Okay. How many Chiefs are there?

7 MS. BIRENBAUM: Relevance.

8 THE WITNESS: I don't know. I don't remember.

9 BY MR. PERRONI:

10 Q Are the Chiefs over certain areas in the
11 department?

12 Do you understand my question?

13 MS. BIRENBAUM: Vague and ambiguous.

14 THE WITNESS: I do understand sort of.

15 The Chiefs are in charge of different
16 units in the department, so they are assigned the
17 responsibilities of different units in the the
18 department.

19 BY MR. PERRONI:

20 Q Right.

21 So each Chief -- and you don't remember
22 how many Chiefs there were, but at the time William
23 McSweeney was in charge of what unit?

24 A He was in charge of Detective Division.

25 Q Okay. And the Detective Division would

1 also include the Homicide Bureau?

2 A That's correct.

3 Q Okay. Now -- so I can get a little time
4 frame here, you said that you began the position that
5 you're in now about five-and-a-half years ago?

6 A Correct.

7 Q Okay. There came a time when you --

8 A Well, let me correct that.

9 Actually, is it five now? Yeah, about
10 five-and-a-half. You're right.

11 Q Five-and-a-half.

12 There came a time when you participated
13 in a police conference relating to the Natalie Wood
14 investigation?

15 A I did.

16 Q Okay. And were you in the position that
17 you hold now at the time?

18 A I am -- or was.

19 Q And how long have you been in that
20 position at the time that you held the first press
21 conference?

22 MS. BIRENBAUM: Misstates testimony.

23 THE WITNESS: I think about a year. I was
24 there about a year.

25

1 BY MR. PERRONI:

2 Q Okay. Let me show you what I have been
3 provided by your counsel in discovery as Petitioner's
4 Exhibit A.

5 Take a look at those and tell me if you
6 can identify those.

7

8 (Exhibit A was marked for
9 identification.)

10

11 MS. BIRENBAUM: This is Exhibit A as to this
12 deposition? Is this Exhibit A as to this deposition?
13 It's premarked with a sticker.

14 MR. PERRONI: Well, I don't know what other
15 deposition we'll be talking about, but to answer your
16 question, it would be Exhibit A to Lieutenant Corina's
17 deposition.

18 THE COURT REPORTER: I need to mark that.

19 MS. BIRENBAUM: Exactly, that's my question.

20 BY MR. PERRONI:

21 Q Take a look at all those and tell me if
22 you -- you need to borrow my glasses?

23 A You know, I forgot my glasses in the
24 car. You're right.

25

1 (Witness reviewed document.)

2

3 MS. BIRENBAUM: Do you remember what the
4 question is?

5 THE WITNESS: Okay. The first page looks like
6 it's just asking about -- announcing a press
7 conference.

8 Let's see, okay. What was the question
9 again?

10 BY MR. PERRONI:

11 Q All right. You got through those all
12 right?

13 A I looked through the first page.

14 Q What they appear to be is -- they are
15 labeled as "Media Advisories" and "Media Availability
16 Location Change," and then there's one more I think
17 that says -- that's titled "Natalie Wood Wagner Death
18 Investigation Case."

19 Really, what I'd like to know is were
20 you the one responsible for the promulgation of this?

21 I mean, was it your job to direct that
22 these be issued?

23 A That's a hard question to answer because
24 not really. It wasn't at my direction.

25 As I remember, we had some media inquiry

1 about that, and people from the media wanted
2 information about what was going on.

3 I think with the investigation -- and I
4 think at the time our Sheriff's Information Bureau
5 which handles all of our press wanted to put something
6 out to the media about, "Okay, if you have questions,
7 you can meet with Lieutenant Corina. He's going to
8 give out a little press conference about the
9 investigation."

10 And I think what happened was so much
11 media interest was on this, they ended up changing the
12 location to headquarters to have the press conference,
13 and so they put out the change of location because it
14 was getting too big for our office.

15 And then -- and then they went out --
16 after the media, I think -- after the press
17 conference, they put out the other one about the death
18 investigation.

19 So really our Sheriff's Information
20 Bureau was putting out a lot of this information.

21 Q So it would have been basically a
22 collaboration between you and the -- what do you call
23 that? Let's see if I can find it in here again.

24 The -- let's see, Sheriff's Information
25 Bureau?

1 A Correct.

2 Q Okay. And I notice in here at the
3 second paragraph on the first page, if you want to
4 read along with me, it says, (as read:)

5 Recently Sheriff's
6 Homicide Investigators were
7 contacted by person -- persons who
8 stated they had additional
9 information about the Natalie Wood
10 Wagner drowning. Due to the
11 additional information, Sheriff's
12 Homicide Bureau has decided to
13 take another look at the case.

14 Is that an accurate statement?

15 A I wouldn't call that accurate.

16 That's not -- we talked to people and we
17 had received some information that made us take
18 another look at the case, so that's not entirely
19 accurate.

20 Q So this media advisory, at least for
21 that paragraph, is not accurate?

22 A Not entirely, correct.

23 Q Okay. And it's not entirely accurate
24 because -- let's see here.

25 Your answer was, "We had received some

1 information that made us take another look at the
2 case"?

3 A Yes. Correct.

4 We received information that made us --
5 we pulled the case off the shelf and took a look at
6 it -- see if it was worth looking at again.

7 Q And you made that decision?

8 A No, I did not.

9 It was kind of a collaboration.

10 Q Between you and whom?

11 A The captain of the unit, Captain Smith,
12 myself, the detectives sat down and took a look at the
13 case.

14 Q All right. So you, Captain Smith, and
15 the detectives all sat down and all of you decided
16 that you would take another look at the case?

17 MS. BIRENBAUM: Going to object as not being
18 reasonably likely to lead to the discovery of
19 admissible evidence in this petition for release of
20 public records.

21 MR. PERRONI: Well, Anna, we entered into a
22 stipulation in this deposition, and the stipulation
23 was that all objections except for the form of the
24 question and privilege are to be reserved, and that is
25 not to the form of the question or privilege.

1 MS. BIRENBAUM: Well, Counsel, I also could get
2 up and stop the deposition at this point and take the
3 witness out. I'd like to --

4 MR. PERRONI: I appreciate it very much, but
5 this deposition will go a lot quicker if you'll just
6 stick with your word.

7 MS. BIRENBAUM: Well, would you like to stick
8 to the subject of the petition that you filed, or are
9 you planning to use this deposition as a means to dig
10 into issues that are not raised in your petition?

11 MR. PERRONI: I'm sorry. All of these
12 questions are designed to go to my petition and your
13 defenses.

14 MS. BIRENBAUM: And how is this designed --

15 MR. PERRONI: And one of your defenses is the
16 investigatory --

17 MS. BIRENBAUM: That the investigation is open,
18 and how is the decision to open the investigation --

19 MR. PERRONI: No. No. I'm not going to argue
20 with you.

21 We had an agreement.

22 MS. BIRENBAUM: I can instruct him not to
23 answer then.

24 MR. PERRONI: We had an agreement, and I would
25 appreciate it very much if you would stick to the

1 agreement.

2 MS. BIRENBAUM: Would you like me to instruct
3 him not to answer the question then?

4 BY MR. PERRONI:

5 Q You can answer the question --

6 MS. BIRENBAUM: Excuse me, sir.

7 You can't direct my client to answer a
8 question, sir.

9 BY MR. PERRONI:

10 Q Are you telling me that it was you,
11 Captain Smith, and the detectives that sat down and
12 decided that you would take another look at the case?

13 A We all reviewed the case and came to the
14 conclusion that it warranted, yeah, another look --
15 take another look at the case.

16 Q The people that I named?

17 A From what I can recall, yes.

18 Q Thank you.

19 Okay. Now, tell me who the detectives
20 were.

21 A Detective Kevin Lowe and Detective Rob
22 Fernandez.

23 You need spelling on those?

24 Hernandez ends with Z, and Kevin, common
25 spelling, Lowe, L-O-W-E.

1 Q Thank you.

2 Now, before I move away from the exhibit
3 to your deposition, Exhibit A, you did, in fact, hold
4 a press conference?

5 A I did.

6 Q Okay. At that press conference, were
7 you asked specifically if Robert Wagner was a suspect?

8 A I was.

9 Q And was your answer no?

10 A Yes.

11 Q And was that truthful?

12 A Yes.

13 MS. BIRENBAUM: I need to take a break. Can we
14 go off the record, Counsel?

15 MR. PERRONI: In addition --

16 MS. BIRENBAUM: Can we go off the record,
17 Counsel? I need to take a break.

18 MR. PERRONI: Sure.

19

20 (Brief recess.)

21

22 BY MR. PERRONI:

23 Q All right. We're back on the record.

24 A Okay.

25 Q Now, we were talking about the press

1 conference that took place on November the 18th, 2011.

2 A Okay.

3 Q All right. In addition, at that
4 conference -- at that press conference, did you say,
5 quote, (as read:)

6 We have several sources
7 that have come forward with
8 additional information, and as I
9 said, we have found it credible
10 enough to take another look at the
11 case.

12 MS. BIRENBAUM: Objection.

13 Not relevant.

14 BY MR. PERRONI:

15 Q Did you say that?

16 A Would you like me to answer that?

17 MS. BIRENBAUM: Yes.

18 That was not an objection that -- it's
19 not an instruction not to answer.

20 THE WITNESS: Yes, I did.

21 BY MR. PERRONI:

22 Q All right. And then finally, did you
23 say, quote, "We'll go wherever the investigation is
24 going to take us"?

25 MS. BIRENBAUM: Not relevant.

1 THE WITNESS: Yes.

2 BY MR. PERRONI:

3 Q Now, do you remember talking to the Los
4 Angeles Times in January of 2013 about the Natalie
5 Wood investigation?

6 MS. BIRENBAUM: Not relevant.

7 THE WITNESS: I do not.

8 BY MR. PERRONI:

9 Q Do you remember telling the Los Angeles
10 Times, quote, (as read:)

11 Wagner was interviewed --

12 Or excuse me.

13 Quote, (as read:)

14 Wagner was interviewed by
15 authorities soon after Wood's
16 drowning in 1981, but the actor is
17 the only person who was on the
18 yacht the night Wood died who has
19 not spoken to detectives as part
20 of the latest inquiry despite
21 repeated requests and attempts.

22 Do you remember that?

23 MS. BIRENBAUM: Objection.

24 Not relevant.

25 THE WITNESS: I don't recall that.

1 BY MR. PERRONI:

2 Q You don't recall it?

3 A I don't recall talking to the Times or
4 what I told them.

5 Q Do you remember talking to the press at
6 all about attempts to talk to Robert Wagner?

7 MS. BIRENBAUM: Objection.

8 Overbroad. Vague and ambiguous. Not
9 relevant.

10 THE WITNESS: I don't -- I talked to a lot of
11 media. A lot of people called.

12 I don't recall what I told them right
13 now -- who I told what right now, so I don't recall.

14 I don't remember talking to the L.A.
15 Times and telling them that, what you're asking me
16 about.

17 BY MR. PERRONI:

18 Q I'm asking if you remember talking to
19 any reporters or anyone with the press about attempts
20 to try to talk to Robert Wagner and him being the only
21 person who was on the yacht that night who has not
22 talked to you.

23 MS. BIRENBAUM: Same objections.

24 Overbroad. Vague and ambiguous. Not
25 relevant.

1 Your question is not -- is it related to
2 the 2013 time frame or ever? It's unclear from your
3 question.

4 MR. PERRONI: My little screen stopped -- oh,
5 here we go. Here we go.

6 THE WITNESS: I don't specifically recall right
7 now if I said that or not or I told them that or not.

8 BY MR. PERRONI:

9 Q Well, I'm asking if you talked to the
10 press about attempts to try to talk to Robert Wagner.

11 MS. BIRENBAUM: Same objections.

12 Overbroad. Vague and ambiguous. Not
13 relevant.

14 BY MR. PERRONI:

15 Q By the way, for the time frame, it's any
16 time.

17 MS. BIRENBAUM: Objections still stand.

18 BY MR. PERRONI:

19 Q Anytime in your lifetime. Okay?

20 A Wow, I may have. I just don't recall
21 specifics who I talked to or who I may have talked to,
22 but I may have.

23 Q Now, let's see here.

24 Do you remember telling anyone with the
25 media since you became lieutenant of the Homicide

1 Bureau that investigators have interviewed more than a
2 hundred people?

3 MS. BIRENBAUM: Objection.

4 Vague and ambiguous. Overbroad. Not
5 relevant.

6 THE WITNESS: I don't recall that or when --
7 if -- that specific, if I said that or not. I don't
8 recall that.

9 BY MR. PERRONI:

10 Q You don't recall whether you said it or
11 not?

12 A No.

13 Q To anyone?

14 MS. BIRENBAUM: Objection.

15 Overbroad.

16 THE WITNESS: I don't remember that. If I did,
17 I don't remember it.

18 BY MR. PERRONI:

19 Q Since this first press conference on
20 November the 18th, 2011, have you told the media that
21 the Homicide Bureau and your detectives have not
22 identified any suspects in the case?

23 MS. BIRENBAUM: Not relevant.

24 THE WITNESS: I don't -- I don't remember.

25 I remember the press conference, when

1 they asked about Robert Wagner being a suspect, I said
2 no, but I don't remember talking to them since then
3 about not identifying a suspect, specifically saying
4 that.

5 BY MR. PERRONI:

6 Q Any suspects?

7 A Correct. I don't remember telling
8 anybody that.

9 Q Anyone that.

10 Well, have you --

11 A Have I --

12 MS. BIRENBAUM: Objection.

13 Not relevant.

14 BY MR. PERRONI:

15 Q -- identified any suspects?

16 MS. BIRENBAUM: Objection.

17 That seeks to find privileged
18 information, and I'm going to instruct the witness not
19 to answer the question as phrased.

20 MR. PERRONI: May I ask you to state what
21 privilege we're talking about?

22 MS. BIRENBAUM: Absolutely.

23 You just asked the witness, a Lieutenant
24 in the Homicide Bureau of the Sheriff's Department, if
25 he has identified any witnesses in an investigation.

1 That is investigatory privilege by
2 the -- unless I misunderstand your question.

3 MR. PERRONI: I didn't ask about witnesses. I
4 asked if the Homicide Bureau has developed any
5 suspects.

6 MS. BIRENBAUM: Yes.

7 I'm sorry if I misspoke. You just asked
8 him if the bureau has identified any suspects.

9 There's an investigatory privilege. I'm
10 instructing him not to answer based on that privilege.

11 MR. PERRONI: There is no investigatory
12 privilege, Anna, and you know it.

13 MS. BIRENBAUM: I'm instructing the witness not
14 to answer.

15 MR. PERRONI: It's not a privilege.

16 MS. BIRENBAUM: I'm instructing him not to
17 answer. You can move on or stop the deposition.

18 MR. PERRONI: I'm putting you on notice that
19 I'm going to seek sanctions if you instruct this
20 witness not to answer questions based on privileges
21 when there is no privilege.

22 MS. BIRENBAUM: If you are using this
23 deposition to seek information about an active
24 investigation by a law enforcement department, I'm
25 asserting that information as privileged.

1 You may not use a civil deposition.

2 It is also so far outside the scope of
3 discovery in a petition for release of documents under
4 the Public Records Act. It is an abuse of discovery.

5 MR. PERRONI: And that is -- that is, you know
6 again, in violation of our agreement.

7 We had a stipulation, and you have
8 violated it now twice.

9 The question to this witness that I'm
10 going to -- and I'm going to ask it again --

11 MS. BIRENBAUM: Ask it again.

12 BY MR. PERRONI:

13 Q Have you since November the 18th, 2011,
14 identified any suspects?

15 I'm not asking you to tell me who they
16 are. I'm just asking you if you've identified any
17 suspects in the death of Natalie Wood.

18 MS. BIRENBAUM: I'm going to object yet again
19 and instruct the witness not to answer that question.

20 MR. PERRONI: I'm going to have to read what
21 you had to say again this time, Anna.

22 And what's the basis of your instruction
23 on that request?

24 MS. BIRENBAUM: Same as previously. It's
25 privileged information, and we will not use that here.

1 It is also not relevant to this
2 petition. It is also an abuse of the Discovery Act
3 and the deposition process.

4 And if you continue to harass my client
5 and repeat this question, we'll seek a protective
6 order and seek sanctions against you.

7 MR. PERRONI: Okay. Well, I think we've --
8 we've got that one pretty well settled.

9 BY MR. PERRONI:

10 Q Since November the 18th, 1971 -- excuse
11 me.

12 Since November the 18th, 2011, have you
13 told any member of the press that Christopher Walken
14 gave a prepared statement and spoke to detectives in
15 your bureau?

16 MS. BIRENBAUM: Not relevant. Vague and
17 ambiguous.

18 THE WITNESS: Yeah, I think I -- I believe,
19 yes, I may have said that we had spoken to Christopher
20 Walken.

21 BY MR. PERRONI:

22 Q You remember telling them that he gave a
23 prepared statement?

24 A I do not remember that.

25 Q Okay. Has he?

1 MS. BIRENBAUM: Objection.

2 Seeks privileged information, and I'm
3 going -- it's also vague and ambiguous, "Has he?"

4 I don't understand what you're asking.

5 Do you understand the question?

6 THE WITNESS: I thought I answered it.

7 We had spoken to him. He talked to us.

8 BY MR. PERRONI:

9 Q And so if I understand, you're directing
10 him not to answer the question as to whether or not
11 Christopher Walken has given a prepared statement?

12 MS. BIRENBAUM: I asked him if he understood
13 the question, sir.

14 If you read the transcript, such
15 instruction hasn't been given.

16 We're still trying to figure out if he
17 understands the question, which is at line 10 -- no,
18 page 28, 11, "Okay. Has he?"

19 Do you understand that question?

20 Because I don't understand that
21 question, but it doesn't mean the witness does not.

22 THE WITNESS: We talked to Christopher Walken,
23 but the part about the prepared statement, I don't
24 know where that came from.

25 I don't recall saying that.

1 BY MR. PERRONI:

2 Q Okay. Since November the 18th, 2011,
3 have you told any member of the media that detectives
4 have also interviewed other actors who knew both
5 Wagner and Wood to learn more about their
6 relationship?

7 A I don't remember saying -- I don't
8 remember telling them about any actors. We
9 interviewed other people who knew them.

10 Q Since November the 18th, 2011, have you
11 told the media that detectives have tried at least ten
12 times to interview Wagner and been refused?

13 MS. BIRENBAUM: Objection.

14 Not relevant.

15 THE WITNESS: I don't remember saying that.

16 BY MR. PERRONI:

17 Q Have you told the media since November
18 the 18th, 2011, that detectives at one point traveled
19 to Colorado to try to speak with Wagner but were
20 unsuccessful?

21 MS. BIRENBAUM: Objection.

22 Not relevant.

23 THE WITNESS: I don't recall that.

24 BY MR. PERRONI:

25 Q Do you remember telling the media -- do

1 you remember telling anybody in the media since
2 November the 18th, 2011, that you all traveled to
3 Colorado to try to talk to Robert Wagner?

4 MS. BIRENBAUM: Objection.

5 Not relevant. Vague and ambiguous,
6 especially as to "you all."

7 THE WITNESS: I don't recall telling the media
8 we traveled to Colorado. I don't recall that.

9 BY MR. PERRONI:

10 Q Do you remember telling the media
11 between -- after November the 18th, 2011, that, quote,
12 "The latest inquiry had turned up new evidence"?

13 MS. BIRENBAUM: Objection.

14 Not relevant.

15 THE WITNESS: No, I don't recall that.

16 BY MR. PERRONI:

17 Q Were you investigating a homicide?

18 MS. BIRENBAUM: Objection.

19 Seeks privileged information as we've
20 discussed previously. I'm going to instruct the
21 witness not to answer -- hold on.

22 I'm going to back up -- back up. I'm
23 rereading your question.

24 The question pending is vague and
25 ambiguous. It's overbroad. It's unlimited as to

1 time.

2 MR. PERRONI: Anna, do you ever keep your word?

3 I mean, I'd just like to know. Just let
4 me know. Do you ever keep your word?

5 MS. BIRENBAUM: I'm not a witness on the
6 record, sir.

7 I'm phrasing objections for the record,
8 and I am telling you I don't understand your question,
9 and I am making objections for the record because it
10 is vague, and I'm trying to avoid having to instruct
11 the witness not to answer based on privilege.

12 If you would like to clarify the
13 question, we can see if we can get to a question that
14 could be answered here.

15 BY MR. PERRONI:

16 Q In the Natalie Wood investigation, were
17 you investigating a homicide?

18 MS. BIRENBAUM: Objection.

19 Overbroad. Unlimited as to time. Also
20 seeks -- are you talking about 1981 to present or
21 after 2011?

22 Okay. Then I'm going to instruct him
23 not to answer based on privilege if you refuse to
24 clarify the question.

25

1 BY MR. PERRONI:

2 Q Since you had the press conference on
3 November the 18th, 2011, was the Homicide Bureau
4 investigating a homicide in Natalie Wood's death?

5 MS. BIRENBAUM: I am going to object on the
6 basis of the privileges we've previously discussed and
7 instruct the witness not to answer that question.

8 MR. PERRONI: Like I said, Anna, I'm putting
9 you on notice about instructing the witness not to
10 answer these questions. It goes directly to one of
11 your defenses.

12 MS. BIRENBAUM: Next question, please, or is
13 the witness free to go?

14 BY MR. PERRONI:

15 Q Now, do you remember anytime between
16 November the 18th, 2011, and today where you made the
17 statement to the press that -- strike that.

18 At anytime between 2000 -- I mean,
19 November the 18th, 2011, and today, have you told the
20 press that it would be up to the prosecutors to decide
21 whether or not to press criminal charges if they -- if
22 you presented a case to them?

23 Do you want me to repeat that?

24 A Please.

25 Q Okay. From November the 18th, 2011,

1 until today, have you ever told any member of the
2 press that it would be up to the prosecutors if they
3 were presented a case as to whether your investigation
4 might lead to criminal charges?

5 A I don't recall saying that. Makes
6 sense, but I don't recall saying that.

7 MS. BIRENBAUM: I'm going to belatedly make a
8 relevance objection.

9 BY MR. PERRONI:

10 Q Okay. All right.

11 MR. PERRONI: Anna, your rules will tell you
12 that you can't make a belated relevance objection, but
13 that's all right. You just keep on going.

14 BY MR. PERRONI:

15 Q Have you presented a case to the
16 prosecutors --

17 MS. BIRENBAUM: Objection.

18 Vague and ambiguous.

19 BY MR. PERRONI:

20 Q -- in Natalie Wood's death?

21 MS. BIRENBAUM: And I'm also going to object
22 based on Evidence Code Section 1040 and instruct the
23 witness not to answer the question.

24 As we've discussed before, that's
25 absolutely privileged.

1 MR. PERRONI: I'm going to make sure I have the
2 full question in there again so that it's real clear
3 here what you're refusing to allow him to answer.

4 BY MR. PERRONI:

5 Q Since November the 18th, 2011, have you
6 presented your files or a case to the prosecutors in
7 connection with Natalie Wood's death?

8 MS. BIRENBAUM: My objections stand, and I --
9 my objection stands.

10 MR. PERRONI: What's a homicide, Lieutenant?

11 MS. BIRENBAUM: Objection.

12 Vague and ambiguous. Seeks an expert
13 opinion.

14 THE WITNESS: It would be the taking of a life
15 by another human being.

16 BY MR. PERRONI:

17 Q And what's a suspect --

18 MS. BIRENBAUM: Objection.

19 BY MR. PERRONI:

20 Q -- in a criminal case?

21 MS. BIRENBAUM: Vague and ambiguous. Seeks an
22 expert opinion.

23 THE WITNESS: I guess most people would
24 consider that the person who committed the crime or
25 was involved with the crime.

1 BY MR. PERRONI:

2 Q Since November the 18th, 2011, have you
3 told the press that you sent a letter to Robert Wagner
4 asking him to talk to detectives from your bureau?

5 MS. BIRENBAUM: Objection.

6 Relevance. Also, I just dropped off my
7 Livenote, whatever we're calling it.

8 MR. PERRONI: Your actions, Anna, are totally
9 obstructing this deposition and dragging it out, and I
10 just want the record to reflect that.

11 MS. BIRENBAUM: Let the record reflect I had
12 technical difficulties, if you need to.

13 MR. PERRONI: Not exactly sure what you're
14 doing over there, but --

15 MS. BIRENBAUM: You can look at my page, sir
16 (indicating).

17 As you see, hmmmmmm, "We can't reach this
18 page."

19 I'm just trying to see the same thing on
20 my computer screen that you have access to with the
21 cloud-based realtime transcription of the deposition.

22 So if you can see the page and I can't,
23 we have a problem, sir.

24 MR. PERRONI: Well, do you have a hearing
25 disability?

1 MS. BIRENBAUM: I don't -- I'm not going to
2 engage in this, sir.

3 As the court reporter will tell you, I
4 have as much right as you do to use the realtime
5 transcription, especially when you are, and I'm having
6 a technical difficulty --

7 BY MR. PERRONI:

8 Q Do you remember the question I asked
9 you?

10 A I do not.

11 MS. BIRENBAUM: Sir, are you continuing on when
12 I'm trying to do the same -- okay.

13 Sir, why don't you turn around your
14 computer so I can see the realtime transcription
15 because I'm trying to tell you I cannot see it, and
16 I'm not willing to continue while I cannot see what
17 you can see on your screen, which is on the court
18 reporter's screen.

19 BY MR. PERRONI:

20 Q Since November the 18th, 2011, have you
21 sent a letter to Robert Wagner, you or anyone in your
22 bureau --

23 MS. BIRENBAUM: Objection --

24 BY MR. PERRONI:

25 Q -- requesting that he submit to an

1 interview by a detective with your bureau?

2 MS. BIRENBAUM: Objection.

3 Violates -- objection. Objection.

4 I'd love to see what I just said.

5 However, as you know, my realtime is not working, and

6 I cannot see what I said.

7 It seeks privileged information in
8 violation of Evidence Code -- I see you can see my
9 words that I can't see.

10 I'm going to instruct the witness not to
11 answer the question.

12 If you want to --

13 MR. PERRONI: Anna, unfortunately, I can't
14 understand a word you're saying.

15 MS. BIRENBAUM: Next question, or are we done?

16 BY MR. PERRONI:

17 Q Let's start over.

18 Since November the 18th, 2011, have you
19 or your bureau sent any letters to Robert Wagner?

20 MS. BIRENBAUM: Objection.

21 Asked and answered -- or asked and
22 instructed not to answer. Instruction remains.
23 Objections remain.

24 BY MR. PERRONI:

25 Q All right. Do you recall talking with

1 reporters in 2013?

2 MS. BIRENBAUM: Not relevant.

3 BY MR. PERRONI:

4 Q All right. Let's do it this way.

5 Earlier in this deposition, you said
6 that at the initial press conference, you told the
7 press that Robert Wagner was not a suspect, and you
8 said that was truthful.

9 Is that what your testimony has been?

10 MS. BIRENBAUM: Asked and answered.

11 Misstates -- misstates the witness's
12 testimony.

13 I'd love to go back and see if that
14 accurately reflects it. However, as I've advised you
15 previously -- Can you please restate the question,
16 Court Reporter? Can I hear it again?

17 MR. PERRONI: I'm not going to have you go back
18 and look this over --

19 MS. BIRENBAUM: Oh, I can't hear the question
20 again?

21 Then I have to instruct the witness
22 not to answer if I can't --

23 BY MR. PERRONI:

24 Q Let's do it this way to make it easier.

25 On November the 18th, 2011, were you

1 asked at that press conference whether or not Robert
2 Wagner was a suspect?

3 MS. BIRENBAUM: Not relevant.

4 THE WITNESS: I was.

5 BY MR. PERRONI:

6 Q And what was your answer?

7 A No.

8 Q All right. Since that press conference
9 on November the 18th, 2011, have you been asked again
10 by the press whether or not Robert Wagner was a
11 suspect?

12 MS. BIRENBAUM: Not relevant.

13 THE WITNESS: I don't recall being specifically
14 asked that. I don't recall specifically being asked
15 again if he was a suspect.

16 BY MR. PERRONI:

17 Q All right. Since November the 18th,
18 2011, have you been asked by the press if Christopher
19 Walken was a suspect?

20 MS. BIRENBAUM: Vague and ambiguous. Not
21 relevant.

22 THE WITNESS: I don't recall that either if he
23 was a suspect or not.

24 BY MR. PERRONI:

25 Q You been asked by the press since

1 November the 18th, 2011, if Dennis Davern was a
2 suspect?

3 MS. BIRENBAUM: Not relevant. Overbroad.

4 THE WITNESS: Again, I don't remember anybody
5 asking that, no.

6 BY MR. PERRONI:

7 Q Since November the 18th, 2011, have you
8 made the statement to the press, quote, "There are
9 four people on the boat that night, and now one of
10 them is dead. Something happened," close quote?

11 MS. BIRENBAUM: Objection.

12 Not relevant.

13 THE WITNESS: I may have said something like
14 that, yes.

15 BY MR. PERRONI:

16 Q You remember when you said that?

17 A I do not.

18 Q So as we sit here today, on May the 3rd,
19 2016, is Robert Wagner a suspect?

20 MS. BIRENBAUM: Objection.

21 Seeks privileged information in
22 violation of the Evidence Code Section 1040.

23 Instruct the witness not to answer.

24 BY MR. PERRONI:

25 Q As we sit here today, on May the 3rd,

1 2016, is Christopher Walken a suspect?

2 MS. BIRENBAUM: Objection.

3 Seeks information that is privileged in
4 violation of California Evidence Code section 1040.

5 Instruct the witness not to answer.

6 BY MR. PERRONI:

7 Q As we sit here today, on May the 3rd,
8 2016, is Dennis Davern a suspect?

9 MS. BIRENBAUM: Same objections. Same
10 instruction not to answer.

11 BY MR. PERRONI:

12 Q With respect to the last three questions
13 that I've asked you, as we sit here today on May the
14 3rd, 2016, is Robert Wagner or Christopher Walken or
15 Dennis Davern a suspect in the homicide death of
16 Natalie Wood?

17 MS. BIRENBAUM: Asked and answered. Vague and
18 ambiguous. Overbroad. Also seeks privileged
19 information as previously discussed and objected to.

20 Instruct not to answer.

21 BY MR. PERRONI:

22 Q Do you remember talking to the Inquirer
23 since November 18th, 2011?

24 MS. BIRENBAUM: Objection.

25 Seeks privileged information in

1 violation of Evidence Code Section 1040.

2 Instruct the witness not to answer.

3 MR. PERRONI: Whether or not he talked to the
4 Inquirer magazine?

5 MS. BIRENBAUM: I'm sorry. I heard "coroner."
6 I didn't hear "Inquirer."

7 As I've told you previously, I'm having
8 technical difficulty with the realtime transcription,
9 and if you would give us a moment so that the court
10 reporter can fix my transcription connection issue, I
11 could see the question, but you're refusing to give us
12 the time to do that.

13 Would you like to give us the time?

14 BY MR. PERRONI:

15 Q Since November the 18th, 2011, have you
16 talked to the Inquirer magazine or newspaper?

17 MS. BIRENBAUM: Objection.

18 Not relevant.

19 THE WITNESS: Is that like the National
20 Inquirer, Inquirer --

21 BY MR. PERRONI:

22 Q The Inquirer, you know, the -- you
23 know -- one you see in the grocery stores.

24 A Yeah. There's quite a few of them --

25 MS. BIRENBAUM: Do you understand what the

1 question's asking?

2 THE WITNESS: Yeah.

3 But -- you're asking if I talked to
4 someone from the Inquirer?

5 BY MR. PERRONI:

6 Q Yeah, anyone from the Inquirer.

7 Any report or anybody from the Inquirer?

8 MS. BIRENBAUM: If you don't understand the
9 question, you don't need to answer it.

10 It's vague and ambiguous, as I've
11 objected to previously.

12 MR. PERRONI: Anna, really, you really are
13 obstructing unnecessarily this deposition, and your
14 instructions to the witness are inappropriate.

15 If the witness doesn't understand my
16 question, the witness can say so. He seems like a
17 very intelligent fellow.

18 MS. BIRENBAUM: He told you he didn't
19 understand it. You need to rephrase it.

20 BY MR. PERRONI:

21 Q Would you like for me to --

22 A Is there somebody you're referring to?
23 Is there a certain person you're referring to?

24 It will make it a little easier --
25 because I get so many calls from people, it would make

1 it easier.

2 Q Well, I'm not sure that you actually
3 talked to this person, but it would be on November the
4 24th, 2014, did you talk to John Bell with the
5 Inquirer newspaper or magazine?

6 MS. BIRENBAUM: Not relevant.

7 THE WITNESS: I don't remember ever talking to
8 a John Bell or the Inquirer.

9 BY MR. PERRONI:

10 Q Okay. So then -- so then you wouldn't
11 remember telling them on November the 24th, 2014, that
12 Robert Wagner was not labeled as a suspect in his
13 wife's death?

14 MS. BIRENBAUM: Not relevant.

15 THE WITNESS: I don't remember telling him that
16 or talking to him.

17 BY MR. PERRONI:

18 Q Let me ask you if you recall speaking
19 with the Inquirer on June the 29th -- well, I
20 shouldn't say on June the 29th -- on or about June the
21 29th, 2015?

22 MS. BIRENBAUM: Not relevant.

23 THE WITNESS: Do I recall talking to them?

24 No. On that date, no.

25

1 BY MR. PERRONI:

2 Q Do you recall talking with anyone in the
3 media in 2015 about the fact that the Homicide Bureau
4 was considering exhuming Natalie Wood's body?

5 MS. BIRENBAUM: Objection.

6 Not relevant.

7 THE WITNESS: I don't remember ever saying
8 that.

9 BY MR. PERRONI:

10 Q Okay. Do you recall telling the
11 Inquirer that detectives recently flew Davern to
12 Hawaii?

13 MS. BIRENBAUM: Objection.

14 Not relevant.

15 THE WITNESS: No.

16 BY MR. PERRONI:

17 Q Okay. Did detectives fly Davern to
18 Hawaii?

19 MS. BIRENBAUM: Objection.

20 Seeks information protected by Evidence
21 Code Section 1040. Instructing witness not to answer.

22 BY MR. PERRONI:

23 Q Did you go to Hawaii?

24 MS. BIRENBAUM: Objection.

25 Vague and ambiguous. Overbroad. Also,

1 not relevant.

2 THE WITNESS: I wish. No, I did not.

3 BY MR. PERRONI:

4 Q That's too bad.

5 A Right.

6 MS. BIRENBAUM: We'd all like to go to Hawaii.

7 You've never been --

8 BY MR. PERRONI:

9 Q Do you recall or do you know that if
10 representatives of the Sheriff's Department's went to
11 Hawaii, that they met with members of the Inquirer
12 magazine?

13 MS. BIRENBAUM: Objection.

14 Not relevant.

15 BY MR. PERRONI:

16 Q Do you know anything about the Inquirer
17 magazine reporters meeting with -- with
18 representatives of the Sheriff's Department in Hawaii?

19 MS. BIRENBAUM: Objection.

20 Not relevant.

21 THE WITNESS: No.

22 BY MR. PERRONI:

23 Q You remember telling the Inquirer
24 magazine in 2015 that the case remains, quote,
25 "active," close quote?

1 MS. BIRENBAUM: Objection.

2 Not relevant.

3 THE WITNESS: I do not remember telling them
4 that, no.

5 BY MR. PERRONI:

6 Q Is that true?

7 MS. BIRENBAUM: Objection --

8 BY MR. PERRONI:

9 Q Is the case still active?

10 MS. BIRENBAUM: Seeks privileged information.
11 Instruct witness not to answer.

12 BY MR. PERRONI:

13 Q Just want to make sure she instructed
14 you not to answer that. I just can't hear what she's
15 saying.

16 In this case, your lawyers have
17 contended, among other things, that I should not be
18 able to get certain records in the files of the
19 Sheriff's Department because it would be an invasion
20 of personal privacy.

21 Are you aware of that?

22 MS. BIRENBAUM: Violates the attorney-client
23 privilege, work product.

24 MR. PERRONI: Are you instructing him not to
25 answer that?

1 MS. BIRENBAUM: Are you asking him what he and
2 I have discussed in attorney-client meetings? Are you
3 asking what he's seen in discovery?

4 MR. PERRONI: Anna, I'll tell you what. If I
5 was asking him what you and he had discussed, I would
6 have said, "What have you discussed?"

7 What I asked was, "Are you aware that
8 your attorneys have claimed that I should not be able
9 to get certain records of the Sheriff's Department
10 because it would be an invasion of personal privacy?"

11 THE WITNESS: I'm aware that they didn't -- did
12 not want to turn over certain records of our
13 investigation. That's what I'm aware of.

14 BY MR. PERRONI:

15 Q Right. But you're not -- you're not
16 aware of the reasons?

17 A I'm not aware of that specific reason.

18 Q Okay. I'm going to read something to
19 you that's out of the answer in this case.

20 Do you know what an answer is?

21 A No.

22 Q Well, in a civil case like this, I file
23 a petition asking the judge to order the Sheriff's
24 Department and the Coroner's Office to give me certain
25 records.

1 And then the Coroner's Office and the
2 Sheriff files an answer. Okay?

3 A Okay.

4 Q All right. And in that answer, in
5 paragraph 30, it's entitled "15th Affirmative
6 Defense."

7 Okay. This is a defense, a reason for
8 not turning over the records, quote, (as read:)

9 Disclosure of the records
10 to the district attorney, if such
11 disclosure was made, does not
12 constitute a waiver by previous
13 disclosure of the documents
14 requested.

15 Have the records of the Sheriff's
16 Department been disclosed to the district attorney?

17 MS. BIRENBAUM: Objection.

18 Violates Evidence Code Section 1040.
19 Instruct the witness not to answer that question.

20 So I apologize for interfering with your
21 questioning, but your next witness is calling me, so I
22 believe he is most likely downstairs.

23 MR. PERRONI: Well, Anna, unfortunately, you're
24 the reason for him having to wait down there, so I
25 don't know what to tell you.

1 MS. BIRENBAUM: Would you like me to call him?

2 If so, I would like to go off the record
3 to tell him you need a few more minutes or have him
4 just stand down there. It's your choice.

5 BY MR. PERRONI:

6 Q In 2011 when you had this press
7 conference, did you open a new file?

8 Do you understand what I'm saying?

9 MS. BIRENBAUM: Objection.

10 Vague and ambiguous.

11 BY MR. PERRONI:

12 Q Did you open a new Sheriff's Department
13 file --

14 MS. BIRENBAUM: And also seeks information
15 privileged --

16 BY MR. PERRONI:

17 Q -- in the Natalie Wood case?

18 MS. BIRENBAUM: Seeks privileged information.
19 Instructing the witness not to answer.

20 BY MR. PERRONI:

21 Q Have you examined the -- what I'll call
22 the 1981 investigative complaint files in the Natalie
23 Wood death?

24 You personally examined them?

25 A Yes. I read the reports from 1981, yes.

1 Q Reports. That's what I meant.

2 A Yes. Yes.

3 Q Well, just to refresh your recollection,
4 there were two complaint numbers. There were two
5 numbers assigned to the case.

6 The first complaint number was based on
7 a report by Detective Kroll. I think it's Kroll,
8 maybe K-R-O-L-L.

9 The next one was a complaint number that
10 was assigned to a report by Detectives Rasure and Roy
11 Hamilton. Okay?

12 Those are the case -- files I'm asking
13 if you've reviewed.

14 A Yes.

15 Q Okay. So you've reviewed those files.

16 And did you review the entire contents
17 of the file, or did you just review the narrative
18 report?

19 A Basically, the reports.

20 Q Just the reports. Okay.

21 So you didn't look at the materials in
22 the files?

23 A I looked at what was there in the files.
24 Basically, I read the reports.

25 Q For instance, did you look at

1 photographs?

2 A Yes.

3 Q You did?

4 A Yes.

5 Q Okay. Were there photographs in the
6 files that were taken by the Sheriff's Department?

7 Do you know?

8 MS. BIRENBAUM: Calls for speculation.

9 THE WITNESS: Yeah. I don't remember.

10 BY MR. PERRONI:

11 Q I'm talking about the old files now.

12 A The old files, I don't remember.

13 Q Okay. Well, Lieutenant, thank you very
14 much.

15 I'm sorry, but you may have to come back
16 and answer some of these questions, but it was nice to
17 meet you and good to see you, and I appreciate your
18 time today.

19 And I don't have any further questions.

20 THE WITNESS: Okay. Thank you.

21 MR. PERRONI: Yeah.

22 MS. BIRENBAUM: Did you want to put the
23 stipulation concerning the review of the record on?

24 Because don't we need to relieve you of
25 your statutory duties?

1 He's actually stuck in traffic. We're
2 off the record.

3
4 (Brief recess.)

5
6 MS. BIRENBAUM: The parties hereby stipulate to
7 relieve this court reporter of her statutory duties.

8 We stipulate -- I guess that's all we're
9 saying. We're not going to -- never mind.

10
11 (Whereupon, at 11:44 a.m.,
12 the proceedings were concluded.)

13
14 --o0o--

DECLARATION UNDER PENALTY OF PERJURY

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I, John Corina, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken May 3, 2016; that I have made such corrections as appear noted on the Deposition Errata Sheet, attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

Dated this ___ day of _____,
20__ at _____,
California.

JOHN CORINA

DEPOSITION ERRATA SHEET

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JOHN CORINA

DATED

1 STATE OF CALIFORNIA)
)
2 COUNTY OF LOS ANGELES)

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4 I, Christine Kwon-Chang, CSR 12143, Certified
5 Shorthand Reporter, do hereby certify:

6 That prior to being examined, the witness named
7 in the foregoing deposition was by me duly sworn;

8 That said deposition was taken down by me in
9 shorthand at the time and place named and thereafter
10 transcribed under my direction;

11 I further certify that I am neither counsel
12 for, nor related to, any party to said proceedings,
13 not in any way interested in the outcome thereof.

14 I declare under penalty of perjury under the
15 law of the State of California that the foregoing is
16 true and correct.

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18 Dated: May 16, 2016

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21 _____
Christine Kwon-Chang
22 CSR No. 12143, RPR, CRR
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