THE STATE OF TEXAS

CAUSE NO. 2021-43156

IN THE MATTER OF THE	)	IN THE DISTRICT COURT OF
	)	
ISSUANCE OF SUBPOENA	)	
	)	HARRIS COUNTY, TEXAS
FOR THE DEPOSITION OF	)	
	)	
ELAINE FINSTAD	)	281ST JUDICIAL DISTRICT

ORAL DEPOSITION OF

ELAINE FINSTAD

December 3, 2021

REPORTED REMOTELY

ORAL DEPOSITION OF ELAINE FINSTAD, produced as a witness, duly sworn by me via videoconference at the instance of the PETITIONER, was taken in the above-styled and numbered cause on December 3, 2021, from 9:04 A.M. to 9:30 A.M., before BRANDON D. COMBS, CSR, RPR, in and for the State of Texas, reported by computerized machine shorthand via videoconference.

APPEARANCES

QUATTLEBAUM, GROOMS & TULL PLLC, 4100 Corporate Center Drive, Suite 310, Springdale, AR 72762, represented by BRANDON B. CATE, Attorney at Law, appeared via videoconference as counsel on behalf of the Petitioner.

Email: bcate@qgtlaw.com

POLLAK, VIDA & BARER, 11500 West Olympic Boulevard, Suite 400, Los Angeles, CA 90064, represented by ANNA L. BIRENBAUM, Attorney at Law, appeared via videoconference as counsel on behalf of the Respondent.

Email: anna@pollakvida.com

ALSO PRESENT:

Samuel Perroni (Via Videoconference)

Bruce Finstad (Via Videoconference)

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(No exhibits marked.)

ELAINE FINSTAD,

having been first duly sworn, testified as follows:

EXAMINATION

Q. (BY MR. CATE) Good morning, Ms. Finstad.

A. Good morning.

Q. We're now on the record. Would you please state your name for the record.

A. Elaine Finstad.

Q. Thank you. My name is Brandon Cate. I'm an attorney in Arkansas with the law firm of Quattlebaum, Grooms & Tull.

Our firm is proud to represent Sam Perroni, who is the petitioner in a lawsuit that we have filed out in California against the Los Angeles County Sheriff's Department, pursuant to the California Public Records Act.

Mr. Perroni seeks to receive copies of various records, some of which relate to records that we believe your daughter, Suzanne Finstad, has already been provided access to based on new things she has written in a book that was republished last year.

We have already deposed Suzanne, as you probably have heard.

And let me ask you just for purposes of the record, Suzanne is your daughter?

A. Suzanne is my daughter.

Q. Thank you. Let me start by getting some preliminary matters out of the way.

I'm here to conduct your deposition.

The purpose is for me to ask you questions, listen to your answers, and report those answers -- and review those answers with Mr. Perroni so that my client can evaluate his claims and offenses that are being raised to his claims in the lawsuit.

You, of course, are not a party to the lawsuit. You are being deposed as a neutral witness. I have no intention of trying to trick you or trap you or confuse you in any way.

So if I ask you a question that you do not understand or that you find confusing, if you would please stop me, tell me you don't understand the question, or that you find it confusing, and I'll do my best to rephrase it or clear it up.

Is that fair?

A. That's clear.

Q. Have you ever given a deposition before?

A. I never have.

Q. You're testifying under oath to tell the truth, just like you would be if we were sitting in a courtroom today.

We have a court reporter here, Brandon Combs, who is taking down everything you and I and anyone else says so that there is a record of today's conversation. To make Mr. Combs' job easier, we need to follow a few guidelines.

Please answer each question orally. Head shakes and nods don't take down to paper very well, so we want to make sure that we have an accurate record if your yeses are yeses and your noes are noes.

For the same reason, uh-huhs and uhn-uhs don't take down very well, so if you say uh-huh, I may ask you, is that a yes or is that a no.

Let's do our best not to talk over one another, and so far you're doing a great job. If you'll let me finish my questions before you start talking, I will do my best not to start talking until you finish your answer.

Is that fair?

A. That is fair.

Q. This is not an endurance contest. At any time we can take a break; just let me know. The only thing I ask is if there's a question pending that you answer the question before we take a break.

Is that fair?

A. That's fair.

Q. Do you have any questions before we get started?

A. I can't think of any right now.

Q. Very good. The subpoena directed you to bring documents related to the investigation into the death of Natalie Wood. Do you have any such documents?

A. I have no documents.

Q. Do you have any photographs related to Natalie Wood?

A. I have no photographs.

Q. Thank you very much.

Did you bring anything else with you for this deposition today?

A. No, I brought myself, and I have my son here.

Q. And just for purposes of the record, I was told your son would be assisting you with the Zoom, and his name is Bruce?

A. That is correct.

Q. Thank you. And you're sitting in Conroe, Texas, today; correct?

A. That is correct.

Q. And that is where you reside?

A. That is where I reside.

Q. Ms. Finstad, what is your vocation?

A. I am a retired teacher, and I was a mother

and a homemaker, and a grandmother.

Q. Well, I know you must be proud of your grandchildren and you should be proud of your daughter. She is a very accomplished writer.

Have you ever worked as a journalist?

A. I have not.

Q. And have you ever worked as a book author?

A. I have not.

Q. Thank you. Have you ever been employed by your daughter Suzanne?

A. I have not.

Q. Have you read any of Suzanne's books about the actress Natalie Wood?

A. I did read the book when it came out, yes.

Q. Okay. I want to focus on some passages from her most recent book about Natalie Wood that was republished last year, and these passages mention you.

First of all, do you remember reading anything about you in the Natalie book, Natalie Wood book that you read?

A. I read it when it came out, the book, only then. I have read her book. That's...

Q. Your daughter Suzanne has written about a visit to a law enforcement office in Los Angeles that you and her made together around Thanksgiving a number

of years ago.

Let me read to you one of those passages regarding that visit, and I'm starting at the bottom of page 458 of the most recent book.

Quote, on a tip from the genial Rasure, I dropped his name to an LAPD detective, Louis Danoff, with the nickname Sweet Lou, and persuaded him to let me see the murder book for the Wood investigation, which did in fact exist.

Within a week I met Sweet Lou at a sheriff's department office on the outskirts of downtown. My mother, who was in Los Angeles for Thanksgiving, came along, a camera tucked into her purse. End quote.

For starters, do you recall accompanying your daughter Suzanne to a law enforcement officer as described in this book passage?

A. I did ride with her in her car. Yes, I did go with her.

Q. How did you and Suzanne know where to go to this particular law enforcement office?

A. I don't remember.

Q. Do you remember any conversations with Suzanne about the reason you were taking this visit?

A. I don't recall.

Q. Do you remember how the visit was arranged?

A. I do not recall. I do not know and I don't recall anything about it.

Q. Do you recall bringing a camera with you?

A. I did have a camera.

Q. And do you recall whether this visit was indeed around Thanksgiving?

A. It was during the Thanksgiving season.

Q. I'm going to turn to the next paragraph on page 459, where Suzanne provides some more details about this visit.

She wrote, Sweet Lou escorted both of us to a small spare room. Inside were a long table and several chairs. I set up my laptop on the table and Sweet Lou returned with one or two boxes he identified as Natalie Wood's murder book.

Then he left the room and closed the door. End quote.

Is this account from Suzanne, your daughter, true and correct as far as you are concerned?

A. I do not remember.

Q. Okay. Are there any details that you remember about this visit?

A. No, I do not remember details.

Q. Do you remember a box or two boxes being brought to the room?

A. I do not remember.

Q. Do you remember anything at all about what you looked at inside the room?

A. I do not remember.

Q. Your daughter writes about meeting with a man named Sweet Lou Danoff. Do you recall meeting this person?

A. I do not recall meeting him.

Q. Do you remember how many people you met when you made this visit to the law enforcement office?

A. I do not remember.

Q. I'm going to read another paragraph to see if it triggers anything in your memory, and I'm still on page 459 of the book, for purposes of the record.

Quote, uncertain how long I would have, what I was permitted to see or whether I could document it, I began to enter the contents of the murder book into my laptop as quickly as I could type. I asked my mother to take photographs.

We both kept an eye on the door, anxious that Sweet Lou might return with restrictions. Neither of us said anything. We both got the sense that we were looking at something that was not meant to be seen. End quote.

Having heard that, does that trigger your

memory regarding the events in this room?

A. I do not remember.

Q. Do you have any reason to doubt anything your daughter has written from these passages?

I'm sorry?

A. I do not have any reason to doubt it.

Q. Do you have a sense of about how long you were in this room with Suzanne?

A. I do not remember.

Q. Let me ask it this way.

Would it be closer to five minutes or closer to an hour? Do you have any memory of that?

A. Well, it would not be five minutes.

Q. Do you think it was over an hour?

A. I do not remember.

Q. But do you recall that Suzanne was doing work in the room?

A. That's what she went there for.

Q. Right. And she was looking at things, I take it, that were provided to her in the room?

A. I do not remember.

Q. Do you remember if Suzanne was satisfied that she was able to get through everything that she came to see?

A. I do not. You would have to ask her that

question.

Q. And just to let you know, we've asked her these questions. We're trying to corroborate what she told us.

You remember bringing the camera; correct?

A. I did bring the camera.

Q. Do you remember taking pictures yourself?

A. I do not recall.

Q. Do you recall if Suzanne took photographs?

A. I do not recall.

Q. Do you recall seeing any developed photographs that were made as a result of this visit?

A. I do not remember.

Q. Do you recall seeing any photographs that were provided to you in this room?

A. I do not recall.

Q. Did you take any notes while you were in the room?

A. I did not take any notes. I was there as a visitor.

Q. Do you recall, Ms. Finstad, if you were told to leave the room, or did you voluntarily leave the room?

A. I do not recall.

Q. Did you leave at the same time as Suzanne?

A. I do not recall.

Q. Do you recall speaking with anyone upon leaving the room?

A. I do not recall.

Q. Is there anything about this visit that you do recall that we haven't already talked about today?

A. I do not recall.

Q. Have you ever lived in Los Angeles?

A. I have not lived in Los Angeles.

Q. After you and Suzanne left, did you drive away with her?

A. Yes, I drove away with her.

Q. And do you remember any conversation you had in the car as you were driving away?

A. I do not recall.

Q. Did you, other than Suzanne, did you discuss with anyone else what you saw in the room that day?

A. No, I did not.

Q. Do you know a person who works for the Los Angeles County Sheriff's Department named Ralph Hernandez?

A. I do not.

Q. Your daughter has emailed me, complaining about the process servers that attempted to serve you and she provided me details of things I didn't know

about.

I do want you to know that we did attempt to have the attorney for your daughter accept service of the subpoena to avoid the process servers and that request was denied. So I apologize if you were offended by the actions of the process servers.

You were very difficult to serve, is what I am told. Is there a reason that you were trying to evade service of the subpoena?

A. I do not recall.

Q. Did anyone ask you to evade service of the subpoena?

A. I do not recall.

MS. BIRENBAUM: Objection on relevance.

That doesn't excuse you from answering because I'm not your attorney. I just need to make a record of my objection.

MR. CATE: And I think she answered she doesn't recall.

Q. (BY MR. CATE) Ms. Finstad, have you spoken to anyone about Mr. Perroni's lawsuit other than your daughter Suzanne and your son Bruce, who is helping with the Zoom?

A. I have not.

MR. CATE: Let's take a quick break, and I'm

going to go over my notes and see how much longer that we have. Is that okay?

THE WITNESS: All right.

MR. CATE: Let's go off the record.

(Off the record.)

MR. CATE: Ms. Finstad, I don't have any further questions at this time. I appreciate your cooperation this morning.

And I pass the witness to Ms. Birenbaum.

MS. BIRENBAUM: I don't have any questions.

But I want to put on the record that we do reserve the right to object to the evidentiary use of this Zoom recording subject to the requirements of Code of Civil Procedure Section 2025.340.

THE REPORTER: Counsel, do you want a copy of the transcript?

MS. BIRENBAUM: Can I have -- I think I have your contact information, so I'll let you know if I do.

MR. CATE: And just for the record, I didn't record this Zoom. I assume you're office is doing that, Mr. Combs; is that correct?

THE REPORTER: I'm not aware of any recording.

MR. CATE: When I logged on it told me it was being recorded, but it's not being recorded by me.

THE REPORTER: I'm not aware of anything either way.

MS. BIRENBAUM: It is being recorded, so hopefully we can stipulate it won't be used in court.

MR. CATE: We don't intend to use this recording in court.

MS. BIRENBAUM: Perfect. And of course we want a copy if you receive a copy of it.

MR. CATE: I don't plan on ordering a copy. I would like the transcript, but I'll email you about that, Mr. Combs.

THE REPORTER: Okay.

(Off the record.)

(Whereupon, the deposition adjourned at 9:30 A.M.)

--oOo--

CHANGES AND SIGNATURE

WITNESS NAME: ELAINE FINSTAD

DEPOSITION DATE: December 3, 2021

PAGE	LINE	CHANGE	REASON

JOB NUMBER 23913

I, ELAINE FINSTAD, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted above.

_____

ELAINE FINSTAD

THE STATE OF TEXAS)

COUNTY OF _____)

Before me, _____, on this day personally appeared ELAINE FINSTAD, known to me (or proved to me under oath or through _____) (description of identity card or other document) to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that they executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this _____ day of _____, _____.

_____

NOTARY PUBLIC IN AND FOR

THE STATE OF _____

My commission expires:_____

JOB NUMBER 23913

THE STATE OF TEXAS

CAUSE NO. 2021-43156

IN THE MATTER OF THE ISSUANCE OF SUBPOENA FOR THE DEPOSITION OF ELAINE FINSTAD	)	IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS 281ST JUDICIAL DISTRICT

REPORTER'S CERTIFICATION
DEPOSITION OF
ELAINE FINSTAD
December 3, 2021
REPORTED REMOTELY

I, Brandon D. Combs, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, ELAINE FINSTAD, was duly sworn by the officer and that the transcript of the deposition is a true record of the testimony given by the witness and the statements of counsel;

That the deposition transcript was submitted on _____ to the witness or to the attorney for the witness for examination, signature, and return to Hanna & Hanna, Inc. by _____;

That the amount of time used by each party at the deposition is as follows:

Q. (BY MR. CATE) 00:19:41

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes counsel for all attending parties of record:

BRANDON B. CATE, Attorney for Petitioner

ANNA L. BIRENBAUM, Attorney for Respondent

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Further certification requirements pursuant to Rule 203 of TRCP will be certified to after they have occurred.

Certified to by me this 10th day of December, 2021.

Brandon D. Combs

Brandon D. Combs, RPR, CSR 10927
Hanna & Hanna, Inc.
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Houston, Texas 77024
713 840-8484 | 713 583-2442
www.hannareporting.com

FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition was/was not returned to the deposition officer on _____;

If returned, the attached Changes and Signature page contains any changes and the reasons therefor;

If returned, the original deposition was delivered to BRANDON B. CATE, Custodial Attorney;

That $_____ is the deposition officer's charges for preparing the original deposition transcript and any copies of exhibits;

The deposition was delivered in accordance with Rule 203.3; a copy of this certificate was served on all parties on _____ and filed with the Clerk.

Certified to by me this _____ day of _____, 2021.

_____

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