

EXHIBIT 4

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Volume: I
Pages: 1-286
Exhibits: 338-349

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL ACTION NO. 12012447-CI-011

* * * * *
TERRY GENE BOLLEA professionally known:
as HULK HOGAN, :
PLAINTIFF :
v. :
HEATHER CLEM; GAWKER MEDIA, LLC aka :
GAWKER MEDIA; et al., :
DEFENDANTS :
* * * * *

AUDIO-VISUAL DEPOSITION OF LESLIE JOHN, Ph.D., a
witness called on behalf of the Defendants, pursuant
to the provisions of the Florida Rules of Civil
Procedure, before Lisa McDonald Valdario, (CSR
#130093), a Registered Professional Reporter,
Certified Realtime Reporter, and Notary Public in and
for the Commonwealth of Massachusetts, at the Offices
of Morgan, Lewis & Bockius, LLP, One Federal Street,
Boston, Massachusetts 02110, on Thursday, May 7, 2015
commencing at 9:58 a.m.

1 APPEARANCES:

2 HARDER MIRELL & ABRAMS, LLP
3 1925 Century Park East, Suite 800
4 Los Angeles, California 90067
5 BY: Charles L. Harder, Esquire
6 charder@hmafirm.com
7 424.203.1600
8 Attorney for the Plaintiff

9 LEVINE SULLIVAN KOCH & SCHULZ, LLP
10 1899 L Street, NW, Suite 200
11 Washington, DC 20036
12 BY: Michael Berry, Esquire
13 mberry@lskslaw.com
14 202.508.1122
15 Attorney for the Defendants

16 ALSO PRESENT: Anthony Piccirilli, video operator
17 G&M Court Reporters, Ltd.
18 800.655.3663
19 www.gmcourtreporters.com
20
21
22
23
24

1 Background and Scope of the Assignment, in the
2 last sentence, it says that, "I have been asked to
3 determine a range of reasonable or fair
4 compensation for being observed naked and having
5 sex on a video published and viewed online without
6 consent." Is that right?

7 A That's what it says.

8 Q And that was your task in preparing this report?

9 A Yes.

10 Q And then to make that determination, you conducted
11 a survey -- right?

12 A Yes.

13 Q So on page 3, up at the top under Summary of
14 Opinion, it says, "I conclude with a reasonable
15 degree of certainty that: The range of money
16 deemed as fair and reasonable compensation for a
17 loss of privacy such as the one experienced by
18 Terry Bollea is approximately \$7 million to \$10
19 million. Is that right?

20 A That's what it says.

21 Q And that's what your conclusion is.

22 A Yes.

23 Q And the conclusion that you've reached is only
24 valid for a loss of privacy such as the one

1 MR. HARDER: Vague and ambiguous. Asked and
2 answered.

3 MR. BERRY: You can just object to form,
4 counsel.

5 A See my previous answer.

6 Q Okay. Let me make sure that I understand, I
7 guess, the way that the survey was structured in
8 the broader sense.

9 The survey asked respondents to imagine
10 themselves in the same situation as Terry
11 Bollea -- right?

12 A Yes.

13 Q And the respondents were then asked to decide how
14 much they should be compensated as if they were
15 injured like Mr. Bollea -- right?

16 A Some of them were. Others were asked to imagine
17 what would be fair compensation assuming that they
18 were famous.

19 Q But ultimately, even for those folks, they were
20 asking about their own views assuming that they
21 were the famous American sports figure -- right?

22 A Yes. I mean, I can't get inside of Terry Bollea's
23 mind. So the point is to describe the situation
24 in a as reasonably similar as possible way, to

1 that that Terry Bollea faced, and then to ask
2 people what is a fair compensation value.

3 Q So the survey asked respondents to put themselves
4 in his place and try to figure out how much the
5 privacy valuation was worth to them as the
6 respondents -- right?

7 A Yes. And by "his place," half of respondents were
8 asked to imagine that it is them. The other half
9 was asked to imagine that they're a famous sports
10 figure, and answer the question as such.

11 But to your point, they're answering the
12 question: For you, what is a fair -- assuming
13 you're that person -- what is a fair value. It's
14 not: What do you think Terry Bollea thinks. That
15 was not the question.

16 Q Okay. And the respondents ultimately were asked
17 how much money they would want to receive if they
18 were in a similar situation to that experienced by
19 Mr. Bollea -- right?

20 MR. HARDER: Objection.

21 MR. BERRY: To form.

22 MR. HARDER: To form, and the report speaks
23 for itself.

24 MR. BERRY: Charles, you can object to form.

1 Q Okay.

2 Did you ever ask Mr. Bollea what the
3 invasion of privacy was worth to him?

4 A No.

5 Q And the survey, based on I think what you said
6 earlier, did not seek to measure the actual
7 emotional distress that Mr. Bollea experienced --
8 right?

9 A Can you repeat that, please?

10 (Question read back.)

11 MR. HARDER: Objection to form. The
12 document speaks for itself.

13 A So do I have to answer that?

14 Q Yes.

15 A I'm not sure how to answer that question.

16 Q Okay. Well, let me ask it a different way.

17 Did the survey describe the emotional
18 distress that Mr. Bollea suffered?

19 A No. It didn't describe that.

20 Q So your conclusion on valuation is not based on
21 any facts about how Mr. Bollea himself was
22 actually affected by Gawker's posting of the sex
23 tape excerpts -- right?

24 A So Mr. Bollea, although I have not spoken to him,

1 I understand from his lawyers that he is extremely
2 emotionally upset about this, and in designing
3 this survey, I made every effort to make
4 conservative decisions.

5 By "conservative," I mean decisions that, if
6 anything, would cause respondents to -- would
7 exert a downward pressure on respondents'
8 valuations. The reason I did that was because I
9 think then it's more credible because, of course,
10 I'm working for this side, and you know -- so
11 that's why I chose -- I made conservative design
12 choices.

13 Now, based on the over eight years of
14 research I have done on surveys, if I had put in a
15 description of how morally and emotionally
16 outraged Terry Bollea was, that, in my expert
17 opinion, if anything, would have dramatically --
18 or could have inflated the valuations that people
19 provided, in turn making our results less
20 credible.

21 Q And so in your survey, you did not present any
22 facts about how Mr. Bollea himself was actually
23 affected by the Gawker posting -- right?

24 A I did not deem that to be relevant, and as stated,

1 compensation?

2 MR. HARDER: Objection to form.

3 A This validates the amount of money that Terry
4 Bollea thinks is fair and reasonable compensation.
5 The reason why it validates it is because the
6 people in this survey, they have no skin in the
7 game.

8 Terry Bollea is in a situation where he will
9 state what he thinks the value of his privacy is,
10 which I believe him. That's what it is.

11 However, one could be skeptical perhaps,
12 which I think is what you're saying, because he
13 stands to actually get that money. So this survey
14 serves as like a sanity check on whether those --
15 those numbers actually are reasonable. And the
16 reason why they help to validate claims from
17 Mr. Bollea is they do validate claims from
18 Mr. Bollea to the extent that they are somewhat
19 consistent with what he is saying because the
20 people in this survey did not stand to actually
21 gain money. I'm not going to actually pay them
22 this value.

23 So this means that it reduces the chance
24 that people are just going to say any high number

1 data tell us that the vast majority of respondents
2 ascribe a number that is higher than that. So --
3 Q Right, but if I -- if the jury sits and listens --
4 trial is going to be a week, two weeks. They sit
5 and listen to all the evidence during the case,
6 and ultimately, a juror awards \$50,000. Is that
7 number wrong?

8 MR. HARDER: Asked and answered. She just
9 answered it, and objection to form.

10 A I already answered it.

11 Q I don't think you did. I think you referred to
12 what the use of the data was. That wasn't my
13 question.

14 A Okay.

15 Q My question is, if a juror listens to the evidence
16 and ultimately awards \$50,000, is that juror
17 wrong?

18 MR. HARDER: Asked and answered. She's
19 already answered that same exact question.
20 Objection to form as well.

21 A Given that most respondents gave valuations,
22 deemed a fair compensation value to be higher than
23 that, I think there are better answers.

24 Q Okay. So you're looking at this distribution

1 criticizing me on those grounds.

2 So that's why I chose to do it this way
3 because I wanted to really design a conservative
4 instrument. Now, importantly, once people have
5 specified the range, they can specify whatever
6 number they think is appropriate within -- if you
7 said tens of dollars and you wanted to -- you were
8 comfortable providing a more specific estimate,
9 then you would be shown a scroller that says
10 approximately how many tens of dollars, and you
11 could scroll that from any number, any whole
12 number, from zero to 99. Or possibly hundred. I
13 have to see the exact endpoint of the sliders --
14 which I can send to you.

15 Q In this survey -- we touched on this earlier --
16 you used 7 million viewers as the 7 million people
17 viewed the tape as one of the facts in the
18 scenario. If that number were inaccurate, would
19 that affect the valuation?

20 A That is hard for me to say because -- so the
21 reason I chose 7 million is because that was based
22 on someone who is an expert in seeing how many
23 people have seen this thing. That's the best
24 estimate, is 7 million. So that's why I focused

1 on 7 million.

2 Now, the extent to which these results
3 extend to different numbers, I mean, we have some
4 clues about that when I asked people, you know,
5 for different fair and adequate compensation
6 values depending on different assumptions about
7 the numbers of people. So there's some data in
8 there.

9 Q So if less people viewed the video, would you
10 expect the valuations to be less?

11 A Well, I would want to look at the data to answer
12 that question.

13 Q How about if all we know is that the video was
14 played 7 million times. We don't know how many
15 people saw it.

16 MR. HARDER: Object to form.

17 Q Would that change the valuation?

18 A I don't know because I didn't ask those questions.

19 Q Do you know if respondents' valuations would
20 change if they were told that of the people who
21 watched the video, most watched only half of it?

22 A I don't know.

23 Q Do you know if the respondents' valuations would
24 change if they were told that a significant

1 MR. HARDER: This has been asked and
2 answered 25 times.

3 MR. BERRY: If you could point to the
4 question, I'd love to see it.

5 MR. HARDER: Yeah, it's when you ask her
6 over and over again: Did you ask the respondents
7 this, did you ask the respondents that, and the
8 answer over and over and over again is: The
9 questions that I asked are in the report. So if
10 it's not in the report, that's -- I didn't ask it.

11 But you keep doing it. Wasting everyone's
12 time.

13 Q Did you tell respondents that the person who
14 posted the tape did not film it?

15 A The questions that I asked are in the report.

16 Q So the answer is no?

17 A If it's not in the report, then I didn't ask them.

18 Q Did you ask that question?

19 MR. HARDER: Seriously, Mike? You're
20 harassing her now. You're just trying to make it
21 difficult. You're trying to rattle her. I'm
22 objecting to this.

23 It's like a game to you. This whole case is
24 a game to everyone on your side. It's just a

1 game. I'm going to ask that you please stop
2 playing the game and you ask her questions that
3 are reasonable, and she will give you reasonable
4 answers.

5 MR. BERRY: Doctor John does not appear
6 rattled to me.

7 MR. HARDER: Well, she has more composure
8 than most.

9 MR. BERRY: And to me, this is not a game,
10 but your client is seeking a hundred million
11 dollars, \$10 million of which apparently is based
12 on this report, and so I'm going to continue to
13 ask questions about the case, and I apologize if
14 it makes you uncomfortable, Charles.

15 MR. HARDER: You're just wasting our time.

16 Q How would respondents know that different people
17 filmed the video and posted the video?

18 MR. HARDER: Objection to form.

19 A I didn't say they know -- they knew that.

20 Q Moving down then, there is three bullets here that
21 talks about what the video depicts of you and your
22 acquaintance -- specifically video. And the first
23 thing you say is: Depicts full frontal footage of
24 you, naked and visibly aroused; do you see that?

1 describing about the qualitative.

2 A Right, and you can see the scroller. There's a
3 screen shot of it earlier, right, in this --
4 that's the scrolly.

5 Q What page is that?

6 A Four.

7 Q Okay. At that point, what were the respondents
8 supposed to be rating as a violation?

9 A They're supposed to be rating the situation of
10 being secretly filmed having sex with your
11 acquaintance in their private home.

12 Q So that didn't mention -- that's not the
13 valuation, the qualitative valuation of the
14 violation of the posting the video -- right? It's
15 the filming.

16 A Secretly filmed.

17 MR. HARDER: Objection to form.

18 A So -- okay. Now that I'm reading -- when I
19 previously answered your question, I didn't read
20 the first line of that page which says: "Now, we
21 will ask you some questions about your opinions
22 with respect to the situation described."

23 So I'd like to revise my answer to the
24 previous question. The intention is that the

1 question on this page is with respect to the
2 situation described.

3 Q How do you know the respondents were rating that
4 situation as opposed to the situation you said
5 first, which was the filming?

6 A I don't know. I can't get in their minds.

7 Q Then the survey goes on to these -- on page 15
8 here. After they do the qualitative thing, it
9 says: Again, imagine that representation -- "that
10 a representative from the website that put the sex
11 video online shows up at your doorstep. This
12 person has come to write you a check to compensate
13 you for the situation."

14 What situation is that referring to?

15 A It refers to the situation that starts on page 12
16 that says: "Please imagine the following."
17 That's the situation it refers to.

18 And I should add that on the Intro screen
19 where it says: Welcome. It says to people that
20 they're going to be asked to complete a series of
21 questions or tasks "for each of two different
22 situations. You will be presented" -- and the
23 sequence says, "you will first be presented with a
24 description the situation." Okay. So that's the

1 first thing that's going to happen, is what
2 they're told. Then they click next, and then
3 they're shown a situation.

4 So then it is -- the next page after the
5 situation says: "Answer the following questions
6 about the situation that was described to you on
7 the previous page."

8 So there is sufficient -- there's reference
9 to the scenario on that page as the situation
10 throughout the survey. So that is the intention,
11 is to answer the question with respect to the
12 situation.

13 Q And how do you know if people think that they're
14 supposed to be getting compensated for the
15 filming, or the posting, or both?

16 A I don't know about the inferences participants are
17 making; what they may or may not have made.

18 Q It continues on and says that -- "We understand
19 that it may be difficult to answer this question."

20 But ultimately, the survey did require an
21 answer to that question. People -- did you have
22 anybody drop out?

23 A I don't think we did. I think that that was
24 required, but I would have to check back to be a

1 hundred percent certain. At any rate, they can
2 still specify zero.

3 Q Why didn't you ask people to apportion
4 compensation between filming and posting?

5 MR. HARDER: Objection to the form. Vague
6 and ambiguous, the word "portion" or "apportion."

7 A I don't know.

8 Q All right. Going on down on page 16.

9 A I can see off the top -- I can see a danger in
10 doing that, which would be confusing to people,
11 and my error alarm bells go off when I think of
12 that. I don't know why I made that specific
13 choice, but that would, in my opinion, add
14 complexity and possibly confusion, increasing
15 error.

16 Q How.

17 A How? So if people are confused about what
18 apportioning means, that is confusing; then that
19 can cause them to give numbers that are not
20 meaningful, that don't reflect their true
21 valuations or true preferences.

22 Q What if you had said -- asked for fair
23 compensation for filming, and then separately
24 asked for fair compensation for posting?

1 A There are better and worse ways of doing that.
2 But the bottom line is, it's still more
3 complicated and has the potential to confuse
4 relative to a more simple scenario.

5 Q Then in these next three paragraphs here on page
6 16, they say -- I understand it starts with the
7 scenario of one person having viewed it, but the
8 questions from the footnotes, I understand also
9 were generally the same except for with 7 million
10 in the other scenario. So the rest of the text
11 were the same -- correct?

12 MR. HARDER: Objection to the form.

13 Q This says, "For starters, we'd like you to specify
14 what the compensation should be for one person
15 having viewed the video. That is" -- you know,
16 and then it continues on. Then there is a
17 footnote, 16, that says, "In the viewership, 7
18 million versions, all mentions" -- it was
19 replaced, right?

20 A Um hmm. Yes.

21 Q So otherwise though, the text is the same.

22 MR. HARDER: Objection to the form.

23 Q Right. "For starters, we'd like you to specify
24 what compensation should be for 7 million people

1 differentiating the one person versus the 7
2 million.

3 A Um hmm. So one person -- instead of it saying
4 "one person" in the 7 million version, it would
5 say, "approximately 7 million people."

6 Q Okay. But otherwise, the text was the same.

7 A Yeah. I mean the number -- the key difference is
8 the one versus 7 million.

9 Q Okay. So then in the next sentence, it asks,
10 "what would be the amount you would deem as fair
11 compensation" -- it continues on. The next
12 paragraph again mentions the word "fair
13 compensation."

14 A Um hmm.

15 Q The following paragraph talks about "fair amount
16 of money," and then the last one, "the most
17 appropriate" -- right? Do you see those? So it
18 says fair compensation, fair compensation, fair
19 amount, most appropriate.

20 A Um hmm.

21 Q In those phrases, what does "fair" mean?

22 A The sum of money such that you would feel
23 adequately compensated.

24 Q Okay. And it was up to the respondents to

1 determine what factors to consider and what was
2 fair -- right?

3 A So I asked the respondents what they thought is a
4 fair and reasonable compensation if they were in
5 the situation, and that's what they answered.

6 Q Okay. Could respondents have considered their
7 sense of justice in determining what was fair?

8 MR. HARDER: Objection to the form.

9 A I don't know what respondents -- what was going on
10 in their mind.

11 Q Okay. Could respondents have considered the need
12 to punish the person who posted the video in
13 determining what was fair?

14 MR. HARDER: Objection to form.

15 A I don't know what was going on in their mind.

16 Q You didn't tell them to not factor in punishment
17 though -- right?

18 MR. HARDER: Objection to form, and asked
19 and answered many times.

20 A There is actually potentially a danger if you say
21 to someone, don't think of a white elephant --
22 they're going to think of a white elephant.

23 So similarly, if I had said -- explicitly
24 drawn attention to the things you're asking about,

1 I think that that would actually make people more
2 likely to think of this as -- to factor in
3 extraneous constructs like punishment.

4 Q Would respondents' valuations have changed if they
5 were told that the person in the scenario had
6 accepted under \$10,000 as fair compensation from
7 the individual who secretly did the filming?

8 A I don't know.

9 Q Would the respondents' valuations have changed if
10 they were told that the person who did the filming
11 kept a video in an unlocked desk?

12 A I don't know.

13 Q Would their valuations have changed if they were
14 told that the person who did the filming did
15 nothing to secure the video?

16 A I don't know.

17 Q Why didn't you include that information?

18 MR. HARDER: Object to the form.

19 A My intention in creating this survey was to come
20 up with -- describe the scenario in a
21 reasonable -- to be a reasonable depiction of what
22 happened, balancing the trade-offs of survey
23 design, one of which being not introducing too
24 much information that would have, in my opinion,

1 and write a check right now, and you can write her
2 the second check at the end of this.

3 MR. BERRY: We're getting towards the end,
4 and I'm happy to write you a check now or when
5 we're done in a half hour.

6 MR. HARDER: I'd like it now.

7 VIDEO OPERATOR: The time is now 5:05. We
8 are off the record.

9 (Off the record.)

10 VIDEO OPERATOR: The time is 5:14. We are
11 now back on the record.

12 BY MR. BERRY:

13 Q We're almost done. I want to jump again to the
14 end of your actual report here on page 9. Kind of
15 end where we began in some respects.

16 There's these two paragraphs here where you
17 mention the \$7 million number and the \$10 million
18 number. Do you see those two paragraphs?

19 A Yes.

20 Q The 7 million compensation value and the 10
21 million compensation value were answers to the
22 same questions -- right?

23 A So they, they were -- in both cases, participants
24 were asked to provide a fair and reasonable

1 compensation, what they believe to be the fair and
2 reasonable compensation value assuming that 7
3 million people had seen the video.

4 Q Right. So both the \$7 million number and the \$10
5 million came from that same basic question.
6 Right?

7 A Yes.

8 Q The only difference in the valuation -- the only
9 difference in the scenarios was the order in which
10 the question was asked -- right? For one group of
11 people, it was asked first. The second group of
12 people, it was asked after going through the
13 different levels of people.

14 A I wouldn't say that's the only thing that differed
15 because one group was first asked if one person,
16 and then later on they were asked to specify,
17 assuming different numbers of people, and then 7
18 million.

19 Whereas, the group, I believe, that is
20 providing the 7 million estimate was asked up
21 front what 7 million people were -- so there
22 was -- it's not just the ordering. There were
23 slightly different things that happened in
24 between.

1 difference then?

2 A I don't know what the -- I'm not sure what you're
3 saying. Can you ask the question again, please.

4 Q Well, you asked me to point to different
5 attributes.

6 A Yes, okay.

7 Q So say that I've gone through this. We have the
8 hundred people sitting there.

9 A Yes.

10 Q I read through the scenario.

11 A Yes.

12 Q I read the same stuff that is in the text of your
13 survey, and I get to the question, and I say:
14 Please rate the extent to which, if at all, your
15 privacy had been violated, and there is a scroll
16 bar on the screen just like your scroll bar, and
17 people can adjust it however they think is
18 appropriate -- what's the difference at that
19 point?

20 MR. HARDER: Objection to form.

21 A So if you had a hundred people here, you could
22 have them each sitting in front of a computer, and
23 they could indicate on a scroll bar, which is --
24 which you could have the same sort of scroll bar.

1 You could just have one that's similar looking and
2 have people on computers, but there is other ways
3 you could do it too.

4 Q No, but I'm just asking the difference between
5 what I've described and the survey. Would there
6 be any other difference other than the in-person
7 description?

8 MR. HARDER: Objection to form.

9 A I bet there are. Yeah.

10 Q Okay. What about the -- same question. Let's say
11 the people are comfortable doing the drill-down.
12 It then asked them the question that you have
13 here: "What's the fair and adequate compensation
14 if 7 million people viewed the sex video?" I
15 would do it the same way and have the same scroll
16 bar.

17 A Okay.

18 Q What would the difference be then for that aspect?

19 A So you're asking me if you have a hundred people
20 sitting here, and each person is at a computer
21 terminal, and you say verbally the question, and
22 they do their answer -- I mean, it's not the same
23 administration as the way it was done on
24 Qualtrics.

1 Q Right, but other than that, can you think of any
2 differences?

3 MR. HARDER: Objection to form.

4 A Well, the lighting might be different. There's
5 any -- there's all kinds of ways in which that
6 could be different from the situation. And
7 there's ways in which it's similar at the same
8 time.

9 Q Okay. Because again, going back again to, I
10 guess, where we started: The Qualtrics scenario.
11 People took the survey wherever they had a
12 computer or laptop or tablet. In my scenario, the
13 people would just be sitting in the room and would
14 have whatever lighting was there as opposed to
15 wherever they happened to be taking the Qualtrics
16 survey -- right? That's what you're talking
17 about; whatever physical environmental differences
18 there are.

19 MR. HARDER: Objection to form. Misstates
20 her prior testimony.

21 A I don't think -- did you just ask me a new
22 question?

23 Q Yeah, I'm just trying to understand -- you said,
24 like ,the lighting might be different. There

1 might be other differences, and I'm asking: The
2 differences you're talking about are the
3 environmental conditions in which you're
4 completing the -- giving your responses to the
5 questions.

6 A Um hmm.

7 Q One, in the Qualtrics, people are wherever they
8 happened to be when they were taking the survey --
9 right?

10 A Yeah.

11 Q And in my scenario, they are sitting in the room
12 that holds a hundred people -- right?

13 MR. HARDER: In Boston, Massachusetts.

14 Q Wherever they happen to be.

15 A Wherever they are, okay.

16 Q So you had mentioned lighting as a difference.
17 I'm saying, like: What you're getting at there is
18 environmental differences where the people are
19 taking the survey.

20 A Yeah.

21 Q Right?

22 A Yeah, but there's -- like, I wouldn't feel
23 confident in my ability to exhaustively list all
24 of the differences, and all of the similarities,

1 and all the categories of differences and
2 similarities right here. Like I don't have
3 anything else to say about that.

4 Q Okay. Has anything that we have discussed today
5 changed the opinions that were offered in your
6 report?

7 A Hmm. Well, I want to correct the typo.

8 Q With the thousands.

9 A Yes. I mean, I would have to think about it, but
10 off the top of my head, off the top of my head,
11 no. But I would want to think about it because
12 you said "anything." And this has been a really
13 intense day.

14 Q Do you plan to do any additional work on this
15 case?

16 A Well, I don't think so. I mean -- what do you
17 mean by work?

18 Q Anything that you would spend time working on your
19 opinion in this case or, you know --

20 A Pontificating.

21 Q Right.

22 A So --

23 Q Anything that you would bill Charles for doing.

24 MR. HARDER: Are you including trial or

1 C E R T I F I C A T E

2 COMMONWEALTH OF MASSACHUSETTS

3 MIDDLESEX, SS.

4

5 I, Lisa McDonald Valdario, Registered
6 Professional Reporter and Notary Public, in
7 and for the Commonwealth of Massachusetts, do
8 hereby certify that:

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

LESLIE JOHN, Ph.D., the witness whose deposition is hereinbefore set forth, was duly sworn by me, that I saw a picture identification for her in the form of her website picture identification, and that the foregoing transcript is a true and accurate transcription of my stenotype notes to the best of my knowledge, skill and ability.

I further certify that I am not related to any of the parties in this matter by blood or marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand and notarial seal this 9th day of May, 2015.

16

17

18 _____
19 Lisa McDonald Valdario, RPR, RMR
20 Notary Public
21 My commission expires: June 15, 2018

20

21 THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT
22 DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME
23 BY ANY MEANS UNLESS UNDER THE DIRECT CONTROL
24 AND/OR DIRECTION OF THE CERTIFYING REPORTER.

23

24