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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- - - - -x
CLAUDIA WILLIAMS, f/k/a CLAUDIA GAYLE,
Plaintiff,
-against-
HARRY'S NURSES REGISTRY, INC., and
HARRY DORVILIER
Defendants.

- - - - -x
Remote
New York, New York
May 23, 2024
10:10 a.m.

CONFIDENTIAL
DEPOSITION of CLAUDIA WILLIAMS, f/k/a
CLAUDIA GAYLE, the PLAINTIFF in the
above-entitled action, held at the above
time and place, taken before ELIZABETH
SCHEIBE, a Shorthand Reporter and Notary
Public of the State of New York.

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APPEARANCES:

ISAACS BERNSTEIN, P.C.

Attorneys for Plaintiff

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BY: STEVEN BALKEN, ESQ.

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by
and among counsel for the respective
parties hereto, that the filing, sealing
and certification of the within deposition
shall be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to form of
the question, shall be reserved to the
time of the trial;

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed
before any Notary Public with the same
force and effect as if signed and sworn to
before the Court.

* * *

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2 C L A U D I A W I L L I A M S, the
3 Witness herein, having first been duly
4 sworn by the Notary Public, was examined
5 and testified as follows:

6 (Prior to the start of the
7 deposition, Defendant's Exhibits A-G
8 were marked for identification.)

9 EXAMINATION BY

10 MR. BALKEN:

11 Q. Please state your full name for
12 the record.

13 A. Claudia Williams.

14 Q. Please state your address for
15 the record.

16 A. 230 River Crest Lane, Covington,
17 Georgia 30016.

18 Q. Good morning. My name is Steven
19 Balken. I am an associate attorney at
20 Ballon Stoll, P.C. We represent the
21 defendants in this action. Specifically,
22 I am associate of lead counsel for
23 defendants.

24 Ms. Williams, I would like to
25 remind you that you are under oath at this

1 C. WILLIAMS CONFIDENTIAL

2 time and will be under oath throughout
3 this deposition.

4 Is that understood?

5 A. Understood.

6 Q. I am going to be asking you some
7 questions. You must answer all of the
8 questions unless your attorney instructs
9 you not to answer them.

10 For all of the questions I need
11 you to respond with a verbal answer. In
12 other words, no gestures or like nodding.

13 Also, if you are unclear about
14 anything I might ask, please feel free to
15 ask me to rephrase or clarify the
16 question. If you answer the question I am
17 going to assume that you understood it,
18 okay?

19 A. Understood.

20 Q. I didn't really hear the
21 response.

22 A. Understand.

23 MR. BALKEN: Off the record.

24 (A discussion was held off the
25 record.)

1 C. WILLIAMS CONFIDENTIAL

2 Q. Have you consumed any alcohol in
3 the last 24 hours?

4 A. I do not use alcohol period.

5 Q. Are you currently taking any
6 type of medication?

7 A. I do not take any medication
8 period.

9 Q. Is there anything that may
10 affect your ability to testify truthfully
11 and accurately today?

12 A. No, sir.

13 Q. Did you review any documents in
14 preparation for this deposition?

15 A. The document that was sent by my
16 attorney, yes.

17 Q. What document specifically did
18 you review, without disclosing what your
19 attorney may have said to you?

20 A. The ones that Harry posted on
21 his website with my personal information.

22 Q. Specifically what documents are
23 you referring to?

24 A. The document that Harry posted
25 on his website, including my driver's

1 C. WILLIAMS CONFIDENTIAL

2 license and my Social Security card.

3 The -- what's the -- I9 or that
4 form, pre-employment forms that you
5 usually have to fill out.

6 Q. Anything else?

7 A. I can't recall. If I could ask
8 my attorney to remind me.

9 Yes, I think there was some more
10 forms. I can't recall specifically.

11 MR. BERNSTEIN: No. Ms.

12 Williams, he is only asking you what
13 your remember.

14 Mr. Balken, I can represent to
15 you that they are all ECF filings in
16 this matter.

17 Q. Have you discussed this case
18 with anyone?

19 A. Yes, I have.

20 Q. Who?

21 A. My husband, my friends, my
22 children.

23 Q. Which friends -- anyone else?

24 A. My husband, my friends, my
25 children, my attorney.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Specifically, which friends have
3 you discussed this lawsuit with?

4 A. My colleagues. Rachel Hill,
5 Andrea Cesar, Sharon Richmond.

6 Q. Anyone else?

7 A. My husband Martin Williams.

8 Q. To clarify, any other friends or
9 colleagues other than the three you just
10 listed?

11 A. I can't recall.

12 MR. BALKEN: Off the record.

13 (A discussion was held off the
14 record.)

15 MR. BALKEN: Can you read back
16 the last question and answer.

17 (Requested testimony was read.)

18 Q. Do you recall the contents of
19 your conversation with each of those three
20 individuals you just named?

21 A. I just told them individually
22 about the case, that Harry has posted my
23 personal information on his website. He
24 is being vindictive.

25 Q. Is it safe to say that you told

1 C. WILLIAMS CONFIDENTIAL

2 all three of them and your children, not
3 talking about your husband, anyone else
4 the same things about the case?

5 A. Yes, consistently. Yes.

6 Q. Can you go into more detail
7 about what you told them, please?

8 MR. BERNSTEIN: Objection. You
9 can answer.

10 A. I told them that I had taken --
11 I sued Harry back in 2008 or 2009,
12 somewhere around there. We won the case
13 and he is unable to accept the defeat.

14 So he has retaliated by posting
15 my personal information on his website by
16 calling me a national fraud or
17 international fraud and a ghost and all
18 those, you know --

19 Q. Are you finished?

20 A. Yes, I think I am finished. You
21 know, it's really -- it gets me anxious.
22 I get anxiety over it. I feel so naked
23 and exposed because of Harry or whatever
24 his name is.

25 Q. Anything else?

1 C. WILLIAMS CONFIDENTIAL

2 A. No, not right now.

3 Q. Let's get into that a bit.

4 What -- like, you just -- how is
5 that -- like it sounds to me like you were
6 describing those actions you described by
7 Harry impacted you negatively; is that
8 correct?

9 A. Yes.

10 Q. Is there any other way it has
11 negatively impacted you?

12 A. I just told you. He gets me
13 anxious. I get anxiety over it. I feel
14 vulnerable. I feel exposed.

15 I don't know. He keeps on
16 investigating me. Do you know what that
17 -- it's crazy. Do you know what things
18 like that I am in my feel bed and somebody
19 is coming though my window.

20 Q. You mentioned how your personal
21 information you said was posted on Harry's
22 website; is that correct?

23 A. Yes. I think you know that too.
24 Yes.

25 Q. To your knowledge, has anyone

1 C. WILLIAMS CONFIDENTIAL

2 used that information to try to steal your
3 identity?

4 A. To my knowledge, I have received
5 -- because I always delete my e-mails -- I
6 have received alerts from Experian.

7 I have received alerts from
8 Experian that my information on the dark
9 web and all things like that.

10 Q. Other than that, do you have
11 any --

12 A. I don't have any direct proof.
13 If that's what you're asking, I don't have
14 direct proof.

15 Q. Do you have any indirect proof,
16 as you term it, other than Experian alerts
17 that your information may be on the dark
18 web?

19 A. I can't recall, but I think I
20 may have. Honestly, I can't recall. I
21 knew I signed up with Experian.

22 When I see things like that I
23 just kind of brush them off. Check my
24 report. I have seen like -- what do you
25 call -- somebody might have run your

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2 credit or something, but because I always
3 kind of, you know, freeze it or lock it so
4 nothing would have happened, but attempts,
5 you know, to run my credit.

6 Q. You've seen attempts to run your
7 credit you said?

8 A. Yes, notifications from
9 Experian. Yes, but I don't have all of
10 those because like I said when I went in
11 it didn't actually go through because
12 always have a freeze on my account so I
13 deleted them.

14 Q. You deleted them?

15 A. Yes.

16 Q. When did you get these alerts
17 from Experian?

18 A. I don't remember. Over time in
19 the last couple of years. The last
20 several years I would say.

21 Q. Is it safe to say you were
22 receiving them before 2020?

23 A. Like I said, I received them
24 over the years. In the last five years.
25 In the last few years. I can't put a

1 C. WILLIAMS CONFIDENTIAL

2 point on it. In the last few years.

3 That's my final answer.

4 Q. I hear you, but I mean, even if
5 -- I don't know, the last four years? I
6 think you can estimate to some extent --

7 A. Yes.

8 Q. -- if you can?

9 A. Yes, in the last four years.
10 Like you said, yes we can use that.

11 Q. It could've started as far back
12 as four years ago?

13 (Speaking simultaneously.)

14 A. It could have started back as
15 far as four years ago, three years ago,
16 whatever time period, but I have gotten
17 alerts.

18 Q. And you deleted all of them; is
19 that right?

20 A. Yes, because my e-mail is full.
21 I can't get messages, so I always have to
22 delete the e-mails when they come in. If
23 I don't they --

24 (Speaking simultaneously.)

25 A. When my inbox is full I have to

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2 delete the e-mails.

3 Q. Understand. When was the most
4 recent time you deleted those e-mails?

5 A. Probably last year.

6 Q. Last year. Okay.

7 Was it after you filed this
8 lawsuit?

9 A. Before and after.

10 Q. So you deleted it before and
11 after you filed this lawsuit?

12 A. Yes.

13 Q. And since -- and the most recent
14 time you said was about a year ago.

15 Does that mean --

16 (Speaking simultaneously.)

17 THE COURT REPORTER: Excuse me.

18 Only one person can speak at a time.

19 I cannot take down two people speaking
20 at once.

21 MR. BALKEN: Read back what you
22 have.

23 (Requested testimony was read.)

24 Q. The most recent time, Ms.

25 Williams, is the most recent time you

1 C. WILLIAMS CONFIDENTIAL

2 deleted the those e-mails related to

3 Experian was a year ago, correct?

4 A. Sir, I did not tell you a year
5 ago. You asked me and I said to you last
6 year. Just listen to me. I did not say a
7 year ago.

8 I said somewhere between last
9 year -- probably early this year.
10 Probably sometime this year, but I did not
11 say a year ago. Those were not my words.

12 Q. Thank you for your
13 clarification.

14 And you said -- so you're saying
15 you currently have none on your inbox --
16 in your inbox regarding to -- related to
17 Experian, correct?

18 A. Yes, that is correct. I don't
19 have any in my inbox.

20 MR. BALKEN: Mr. Bernstein, I am
21 going to call for production for any
22 of these e-mails.

23 To the extent they are deleted,
24 she can search her trash, and, you
25 know, the worst case -- there are ways

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2 to get that information anyway I
3 believe. That is our request.

4 MR. BERNSTEIN: Taken under
5 advisement. Please follow up in
6 writing.

7 Q. Other than Experian alerts, Ms.
8 Williams, have you -- do you have any
9 other reason to believe that someone has
10 attempted to steal your identity or your
11 money using the information that was on
12 Harry's website that we discussed?

13 A. Repeat the question.

14 MR. BALKEN: Elizabeth --

15 (Speaking simultaneously.)

16 (Requested testimony was read.)

17 A. There is a possibility, but as
18 of now I would say not that I know of.

19 Q. When did you become aware of
20 this information being on the website that
21 we discussed?

22 A. Around the time we filed a
23 lawsuit. I would say just prior to that.

24 Q. Just prior to filing a lawsuit?

25 A. Yes, prior to filing a lawsuit.

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2 Q. Before you estimated the
3 possibility of receiving Experian alerts
4 as far back as four years ago.

5 Have you been receiving these
6 Experian alerts as --

7 A. Let me say, you interjected that
8 is was four years ago.

9 (Speaking simultaneously.)

10 THE COURT REPORTER: Only one
11 person can speak at a time. The
12 record is not going to be clear.

13 THE WITNESS: I want to take a
14 break.

15 MR. BALKEN: I would like --

16 (Speaking simultaneously.)

17 MR. BALKEN: I would like to
18 finish the question that is pending.

19 THE WITNESS: No. I am really
20 emotional right now. I need to move
21 from the computer and compose myself.

22 MR. BALKEN: You need to answer
23 the question first and then we can
24 take a break.

25 THE WITNESS: What was the

1 C. WILLIAMS CONFIDENTIAL

2 question.

3 MR. BALKEN: Elizabeth, read
4 back the question.

5 (Requested testimony was read.)

6 Q. Have you been receiving these
7 long before you filed a lawsuit?

8 MR. BERNSTEIN: Objection.

9 A. I think I already answered that.
10 I think I answered your question already,
11 sir.

12 Q. Are you refusing to answer the
13 question?

14 MR. BERNSTEIN: Answer it again.

15 A. Yes, I would say something like
16 that. Yes.

17 MR. BALKEN: One more question
18 and then I can let you take a break,
19 if that's okay with you and Mr.
20 Bernstein.

21 THE WITNESS: It is not okay
22 with me. Just give me five minutes.

23 MR. BALKEN: No problem.

24 (A recess was taken.)

25 Q. Ms. Williams, based on what we

1 C. WILLIAMS CONFIDENTIAL

2 just said you have been receiving these
3 Experian alerts long before you learned of
4 information on Harry's website, correct?

5 A. I have. Yes, I have been
6 receiving information. Yes, I have been
7 receiving the alerts before. Yes.

8 Q. I want to circle back to what
9 you mentioned before about how this has
10 negatively impacted you. You listed a
11 bunch of ways -- a bunch of ways that it
12 has.

13 I want to know, was there a
14 specific -- from all those ways is there a
15 specific one that has been most prominent
16 the way this has haunted you?

17 MR. BERNSTEIN: Objection. You
18 can answer.

19 A. It gives me anxiety.

20 Q. Would you say that is the most
21 significant harm that has -- that you have
22 received as a result of --

23 A. It gives me anxiety to the point
24 where even when I knew information on his
25 website, when I saw it the first time I

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2 hesitated to go back and look at it.

3 I could not believe someone
4 could be that evil to publish somebody's
5 personal information to the public just
6 because of something he did wrong that he
7 had to pay for. It was nerve wracking.

8 Q. I did not hear -- can you repeat
9 the last --

10 A. It was never wracking.

11 Q. Never wracking. Okay.

12 Why do you believe that he was
13 doing this to retaliate against you?

14 A. Why do I believe he was doing it
15 to retaliate against me? Are you aware
16 that we did file a Class Action lawsuit
17 against him back in 2009. I was the main
18 plaintiff in the lawsuit.

19 Q. Is that your reason for
20 believing that he did it to retaliate
21 against you?

22 MR. BERNSTEIN: We are talking
23 about the Plaintiff's personal belief
24 now, correct?

25 MR. BALKEN: As opposed to what?

1 C. WILLIAMS CONFIDENTIAL

2 MR. BERNSTEIN: As opposed to
3 her legal position in this lawsuit.

4 MR. BALKEN: Yes, we are talking
5 about her personal belief.

6 A. What was your question? What
7 was your question?

8 Q. On what basis do you believe the
9 defendants here are retaliating against
10 you for filing the lawsuit you mentioned?

11 A. It's employer retaliation.

12 Q. What makes you believe that?

13 A. Because it is so.

14 Q. Do you have any other reason to
15 believe that?

16 A. Because again -- I really don't
17 like repeating myself. It is employer
18 retaliation --

19 (Speaking simultaneously.)

20 A. He has scandaled (sic) myself
21 and my attorney on his website. He called
22 us every name in the book.

23 Every description that applies
24 to Harry, that is what he calls us.

25 Everything that he is, that's what he puts

1 C. WILLIAMS CONFIDENTIAL

2 on us.

3 Q. Correct me if I'm wrong, you're
4 basis for believing that Harry is
5 retaliating against you is because he
6 calls you and your attorney names on his
7 website that --

8 (Speaking simultaneously.)

9 THE COURT REPORTER: Excuse me.
10 You need to let him finish the
11 question.

12 Please ask the question again.

13 MR. BALKEN: If you can pause a
14 minute before you answer the question
15 because of the technical disconnect.

16 Q. Correct me if I'm wrong, your
17 basis for believing that the defendant is
18 retaliating against you for filing that
19 lawsuit is that they -- is that they
20 called you and your attorney names that
21 actually pertain to them; is that correct?

22 A. That is not correct.

23 Q. What is --

24 A. That -- the basis -- I will
25 repeat. As I said before and I will say

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2 it again.

3 The base for filing for the
4 post -- I'm sorry. He is retaliating
5 against me because I took him to court.
6 We filed a class action lawsuit against
7 him. That's the reason he had to pay.

8 Q. How do you know that is the
9 reason?

10 A. I believe it is the reason.

11 Q. Do you have any other basis
12 other than that to believe that is the
13 reason?

14 A. Harry and I are not friends. We
15 were never friends. The only relationship
16 we had was employer employee.

17 Q. Do you have any other basis to
18 believe that Harry is retaliating against
19 you for filing that lawsuit?

20 A. I said -- as I said before,
21 Harry and I are not friends. We were
22 never friends. I was always an employee.

23 Q. So there was no other reason
24 that-

25 A. I don't know. I don't know.

1 C. WILLIAMS CONFIDENTIAL

2 The only reason I believe is because I
3 filed a class action lawsuit against him
4 and he had to pay. He cannot accept that
5 defeat.

6 Q. Other than the lawsuit that we
7 mentioned and this lawsuit, have you ever
8 been a party to a lawsuit?

9 A. Other than this lawsuit and what
10 other lawsuit?

11 Q. The underlying lawsuit that you
12 believe defendants are retaliating against
13 you for and -- let's start -- we will
14 refer to that as Gayle versus Harry's
15 lawsuit?

16 A. Clarify your question please or
17 make --

18 (Speaking simultaneously.)

19 Q. Have you ever been involved in
20 any other lawsuits other than the two we
21 have discussed?

22 A. What is the relevance? What is
23 the -- how is that relevant?

24 MR. BERNSTEIN: Ms. Williams,
25 you have to answer even irrelevant van

1 C. WILLIAMS CONFIDENTIAL

2 questions unless I instruct you not
3 to.

4 A. I don't think so.

5 Q. You don't believe so?

6 A. I don't believe so.

7 Q. Have you ever testified at a
8 deposition before today?

9 A. Yes.

10 Q. When?

11 A. When we filed that lawsuit
12 against Harry, the first one.

13 MR. BALKEN: Going forward, Mr.
14 Bernstein, like when I -- can we
15 stipulate that when I say -- we are
16 going to refer to this underlying
17 lawsuit as the FLSA lawsuit for
18 simplicity.

19 MR. BERNSTEIN: That's okay with
20 me as long as it's clear to the
21 witness.

22 Q. Ms. William, if refer to this
23 lawsuit as the FLSA lawsuit, I am talking
24 about the original lawsuit that you
25 filed --

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2 A. Sure.

3 Q. Other than the FLSA lawsuit,
4 have you testified at a deposition?

5 A. No, I never testified at a
6 deposition before this one. I can't
7 recall. I don't think so.

8 Q. You never testified at a
9 deposition before this, before the one in
10 the FLSA lawsuit?

11 A. That's what I am saying. I
12 don't recall testifying. I do not recall
13 being at any other deposition but this one
14 and the one previous lawsuit.

15 Q. That was a single deposition?

16 A. For which one, the FLSA lawsuit?

17 Q. Yes.

18 A. I think so. Mr. Bernstein can
19 confirm or deny that, but I think so.

20 MR. BALKEN: To the extent there
21 are any other deposition transcripts
22 other the one that, you know, that's
23 in the record in the FLSA lawsuit, we
24 are calling for production of that.

25 (Speaking simultaneously.)

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2 MR. BERNSTEIN: Taken under
3 advisement.

4 (Speaking simultaneously.)

5 MR. BERNSTEIN: Taken under
6 advisement. Please follow up in
7 writing.

8 Q. Since your deposition in that
9 FLSA lawsuit have you undergone any
10 further education?

11 A. Yes.

12 Q. What?

13 A. Why?

14 Q. What? What education?

15 A. I am a nurse. I am an advanced
16 practice registered nurse.

17 Q. Where did you go to school to
18 get that additional education?

19 A. Colombia State University. I'm
20 sorry, Columbus State University.

21 Q. You said you are an advanced
22 registered nurse now as opposed to --

23 A. I am an advanced practice
24 registered nurse.

25 Q. Are you a nurse practitioner?

1 C. WILLIAMS CONFIDENTIAL

2 A. Yes, I am a nurse practitioner.

3 Q. Is that the same thing as an
4 advanced registered nurse or --

5 A. It is the same thing. It's the
6 same thing.

7 Q. When did you become a nurse
8 practitioner?

9 A. In 2020.

10 Q. 2020. Okay.

11 Do you have any licenses?

12 A. Professional or driver's
13 license?

14 Q. Let's start with all.

15 A. Yes, I do.

16 Q. Can you list them for me.

17 A. I have an advanced practice
18 registered nurse license. I have a
19 registered nurse license. I have my
20 driver's license. I have -- yeah.

21 Q. Any other licenses?

22 A. Professional licenses.

23 Q. Is that a specific type or a
24 broad category?

25 A. You tell me.

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2 Q. It's called a professional
3 license or are you describing a
4 professional license?

5 A. My licenses are professional
6 licenses.

7 Q. Are you aware of what an NPI is?
8 Have you ever heard that term?

9 A. Yes, I know what an NPI is.

10 Q. What is it?

11 A. National Provider Identification
12 number.

13 Q. Do you have one?

14 A. I have to have one.

15 Q. Since what point did you have to
16 have one?

17 A. I have to have one as an advance
18 practice registered nurse, but I had it
19 before that because I used to work for
20 Medicare.

21 I used to work for CMS. So I
22 needed one then and I applied for one. I
23 think one since I had an LPN.

24 Q. When was that you first
25 received --

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2 A. I don't recall the exact date.
3 I will have to research. I applied for
4 one since I was an LPN.

5 Q. Approximately when did you
6 become an LPN?

7 A. I was an LPN -- in 2006 I became
8 an LPN.

9 Q. So around 2006 -- since around
10 2006 you've had an NPI number --

11 A. No, that is not my testimony.
12 It was way after -- long after. I am not
13 sure, but I did not have it initially
14 becoming an LPN.

15 Q. Why not?

16 A. Because I didn't need it then.

17 Q. Why didn't you need it then?

18 A. Because I was working for an
19 organization. I didn't -- I didn't need
20 it. It is not necessary.

21 Q. You were not working
22 organizations after a certain point,
23 correct?

24 A. What I am saying is, I was an
25 employee at a facility. So the need for

1 C. WILLIAMS CONFIDENTIAL

2 an NPI -- there was no -- there was no
3 need for an NPI. I applied for an NPI
4 when I started doing home care services.

5 Q. Meaning you had your own home
6 care --

7 A. Meaning that -- no, I'm sorry.
8 Go ahead.

9 Q. When you say home care services,
10 are you referring to Harry's Nurses
11 Registry?

12 A. What I am referring to is when
13 you do home care services and you get
14 payment from a center from Medicare and
15 Medicaid you have to have a Medicaid ID
16 number.

17 There was a point when Medicaid
18 numbers became obsolete and you had to
19 apply for an NPI number.

20 That's when it was kind of a
21 transition to the Medicaid ID to the NPI
22 number. I didn't it for Harry's Nurses
23 Registry because Harry's Nurses Registry
24 was paying us as an employee.

25 I only needed NPI number when I

1 C. WILLIAMS CONFIDENTIAL

2 was working directly for CMS.

3 Q. How did you obtain that NPI
4 number? Did you submit an application?

5 A. No, you just go online and apply
6 for it.

7 Q. You go online and apply.

8 Do you receive any confirmation
9 e-mails or do you insert documents into a
10 portal?

11 A. You don't have to do any of
12 that. You just have to give them your
13 personal information and your license
14 number and the number is generated right
15 there online for you. It takes --

16 (Speaking simultaneously.)

17 Q. How do you give them your
18 personal information?

19 A. It's the government. You put
20 your information in. I don't know what
21 goes on in the background, but it's a
22 number for you and in two to three minutes
23 you have it.

24 Q. So you enter it into a Dropbox?

25 MR. BERNSTEIN: Objection.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Do you upload any documentation
3 showing that information to be yours?

4 A. You don't have to upload any
5 information.

6 MR. BALKEN: I am going to call
7 for production of the NPI application
8 or license. Not license. Status.

9 (Speaking simultaneously.)

10 MR. BERNSTEIN: Taken under
11 advisement. Please follow up in
12 writing.

13 Ms. Williams, there is no
14 question pending.

15 Q. What do you wish to just say?

16 A. You say I can say what I want to
17 say?

18 Q. Yes.

19 A. I -- you asked me how I obtained
20 NPI number. I told you there is a --
21 there is a -- the application is complete
22 online. I know documents are required to
23 be uploaded.

24 I am not sure what documents
25 you're expecting to get that were uploaded

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2 in the system. Thank you.

3 Q. Have any of your licenses that
4 we just mentioned ever been revoked?

5 A. No.

6 Q. Have they ever been suspended?

7 A. No.

8 Q. After Harry's Nurses Registry
9 where else have you worked?

10 A. I can send you a copy of my
11 resume because if I were to sit here and
12 tell them to you it is going to take some
13 time.

14 Q. Sure. You can send us a copy of
15 your resume, but I want you to know -- I
16 want you to tell me briefly what you can
17 recall.

18 A. Let me pull up my resume --

19 Q. The screen is on your keyboard
20 and you cannot pull out any documents
21 right now.

22 MR. BERNSTEIN: Mr. Balken, I
23 don't mean to interfere with your
24 deposition, but I do have a
25 suggestion.

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2 Why don't you just ask her in
3 reverse chronological order where she
4 has worked?

5 Q. Would that work better for you,
6 Ms. Williams?

7 A. What was that?

8 Q. Would it work easier for you if
9 we went in reverse chronological order?

10 A. You can do that.

11 Q. Where are you working now?

12 A. I am currently self-employed at
13 this time.

14 Q. What do you do?

15 A. I think I told you before I am
16 an advanced practice registered nurse.

17 Q. What kind of -- can you just
18 provide NP services?

19 A. Yes, I do.

20 Q. Can you be more specific?

21 A. I do medical, aesthetic and
22 primary care.

23 Q. How long have you been doing
24 that?

25 A. I have been doing that since

1 C. WILLIAMS CONFIDENTIAL

2 2020.

3 Q. Before that where were you
4 employed?

5 A. I was -- before 2020 I was
6 employed at Venice Visiting Nurse Services
7 of New York.

8 Q. What did you do for them?

9 A. Manager of -- manager of care
10 management.

11 Q. How long were you there?

12 A. Probably -- I don't know. I
13 think I went July 2019 probably and I left
14 there at the beginning of the pandemic.

15 That was about March 2020.
16 March 17, 2020 was my last day to be
17 exact.

18 That was the day when they
19 started doing Upstate place in New York.
20 When I saw New York I came back home.

21 Q. Where did you go -- where did
22 you work before that?

23 A. Where was I working before that?

24 Q. It's okay if you don't recall.

25 A. You'd have look at my resume. I

1 C. WILLIAMS CONFIDENTIAL

2 have worked in many places. I am not
3 sure.

4 Q. Between the -- between the
5 places you just mentioned and Harry's
6 Nurses Registry approximately how many
7 places have you worked?

8 A. A lot. I do look on
9 assignments. I do short-term assignments.
10 I worked many places.

11 Q. More than 30?

12 A. I don't know. Probably. I
13 worked at Grace Memorial Hospital here in
14 Atlanta.

15 I've worked at -- oh, god.
16 Between 2020 when I left GSVNY (sic) I
17 went back to New York to work at the New
18 York Eye Center.

19 I left there and I went to
20 urgent care to work and then I left and I
21 was deployed to the agency to go to the
22 border to work with undocumented minors in
23 El Paso, Texas.

24 I went to Louisiana to work at a
25 clinic. I went to Louisiana to work -- to

1 C. WILLIAMS CONFIDENTIAL

2 do MAB (sic) clinic for Covid patients.

3 I also went to New Hampshire to
4 work to do the same thing. I was at Coney
5 Island Hospital in New York when I worked
6 with Covid patients. I worked many
7 places.

8 Q. Would you say it was more than
9 50?

10 A. I don't -- I don't have a
11 number. I never sat down and counted it.
12 I cannot put a number on it.

13 Q. Is every case -- is every place
14 that you've worked at stated on the resume
15 you just mentioned?

16 A. No, probably not.

17 Q. Why not?

18 A. Because sometimes short-term
19 assignments. It depends on what job I may
20 be applying for. It's not necessary. I
21 may not put them there. So they're not
22 relevant to job application, but
23 99 percent of them are there.

24 Q. Approximately how many are not
25 on the resume?

1 C. WILLIAMS CONFIDENTIAL

2 A. I don't know. I don't know.

3 MR. BALKEN: I am going to leave
4 a blank -- we will leave a blank space
5 on the transcript and you can insert
6 every place you've worked at.

7 (INSERT)

8 THE WITNESS: I will submit the
9 resume.

10 Q. You just testified it did not
11 contain all the places you worked at?

12 A. Right. I might have worked
13 somewhere for one day and I didn't like it
14 and I left. It doesn't mean I worked
15 there.

16 Q. Other than places you worked for
17 one day are there things missing from the
18 resume?

19 A. No.

20 MR. BALKEN: I am still going to
21 leave a blank space in the transcript
22 for you to insert any places you can
23 ascertain you worked at that are not
24 on the resume.

25 I am also going to call for

1 C. WILLIAMS CONFIDENTIAL

2 production of this resume.

3 MR. BERNSTEIN: Taken under
4 advisement. Please follow up in
5 writing.

6 Q. Do you have a middle name?

7 A. Yes, I do have a middle name.

8 Q. What is it?

9 A. Cecile.

10 Q. Do you have any nicknames?

11 A. No.

12 Q. Other than Williams and Gayle
13 have you been known by any other names?

14 A. Last names?

15 Q. Yes.

16 A. No.

17 Q. Other than Claudia Cecile, have
18 you had any other first or middle names?

19 A. That's not my name. My name is
20 Claudia Cecile Williams. Formerly Claudia
21 Cecile Gayle.

22 On my Facebook page my name is
23 Dia Gayle, the last part of my name.
24 Other than that, that's it.

25 Q. You said your Facebook page you

1 C. WILLIAMS CONFIDENTIAL

2 are list as Dia Gayle?

3 A. Yes, the last part of my name.
4 The second syllable D-I-A.

5 Q. Why haven't you changed the name
6 on your Facebook page?

7 A. I don't use it. It was --

8 Q. When was the last time you used
9 it?

10 A. I don't know.

11 MR. BALKEN: I am going to call
12 for the production of any social media
13 documents containing -- no, accounts
14 of Ms. Williams that include this
15 Facebook account and any others.

16 MR. BERNSTEIN: Taken under
17 advisement. Please follow up in
18 writing.

19 I would like to take a
20 one-minute break.

21 (A recess was taken.)

22 Q. Ms. Williams, can you please
23 spell your middle name.

24 A. C-E-C-I-L-E.

25 Q. And the spelling, the way you

1 C. WILLIAMS CONFIDENTIAL

2 spelled your first and last name for the
3 reporter at the beginning of the
4 deposition, is that the only spelling that
5 you ever used with those names?

6 A. If that's the only way you can
7 spell. C-L-A-U-D-I-A.

8 Q. What about Williams?

9 A. W-I-L-L-I-A-M-S.

10 Q. You mentioned prior names
11 Mathias or Matthews.

12 Can you spell it, please?

13 A. I think it's M-A-T-H-I-A-S.

14 Q. You're not sure how to spell
15 your former name?

16 A. M-A-T-H-I-A-S.

17 Q. Are there any other spellings
18 that you have used for that name?

19 A. No.

20 Q. Before that what name did you
21 have?

22 A. G-A-Y-L-E.

23 Q. Did you use any other spelling
24 for that name ever?

25 A. G-A-Y-L-E. That's my --

1 C. WILLIAMS CONFIDENTIAL

2 G-A-Y-L-E is the only spelling I have
3 used.

4 Q. What is your date of birth?

5 A. October 30, 1967.

6 Q. To your knowledge, are there any
7 records that have an inaccurate date of
8 birth for you?

9 A. I would not think so. I don't
10 think. It is possible, but as far as not
11 to my knowledge.

12 Q. To your knowledge, are there any
13 records that contain an inaccurate Social
14 Security number for you?

15 A. Not to my knowledge.

16 Q. Were there ever to your
17 knowledge?

18 A. Not to my knowledge.

19 Q. And that goes for your date of
20 birth to, correct?

21 A. Not to my knowledge.

22 Q. Okay. You were born in Jamaica,
23 correct?

24 A. Correct.

25 Q. You first travelled to the

1 C. WILLIAMS CONFIDENTIAL

2 United States in 1991, correct?

3 A. Approximately. I am not exactly
4 sure. It could be 1991 or around that
5 time approximately.

6 Q. Did you -- how did you travel to
7 the US at that time?

8 A. I had a visitors visa. That's
9 how. I had a visitors visa. I was going
10 to travel to the US.

11 Q. What was the reason you obtained
12 that visa to travel to the US?

13 A. It was a visitors visa.

14 Q. Why did you travel -- why did
15 you use that visitors visa to travel to
16 the US?

17 A. I went to US Embassy. I applied
18 for visa and they gave it to me and I came
19 to US.

20 Q. You're not answering the
21 question.

22 A. I don't know how to answer the
23 question because -- I'm sorry, but I don't
24 know how to answer your question.

25 Are you asking me why I

1 C. WILLIAMS CONFIDENTIAL

2 travelled -- why I used a visa to --

3 Q. Yes. What was your purpose of
4 travelling to the US?

5 A. It was a visitors visa. I
6 wanted to visit the US.

7 Q. Why?

8 A. Because I wanted to.

9 MR. BALKEN: Let the record
10 reflect that the witness is refusing
11 to answer the question.

12 MR. BERNSTEIN: The record
13 reflects no such thing, Mr. Balken.

14 I understand what your question
15 is, but the witness doesn't. Perhaps
16 you should think of another way to ask
17 it.

18 MR. BALKEN: I have asked it
19 multiple ways. I think it's pretty
20 clear what I am asking here.

21 MR. BERNSTEIN: Well, I know you
22 do, but the record does not reflect a
23 refusal by the witness to answer.

24 MR. BALKEN: I think it does.
25 We can mark it for a ruling.

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2 I will try again.

3 Q. What was your motivation for
4 travelling to the US?

5 A. Because the US was a different
6 country where I was born. I wanted to
7 visit the US because it was a different
8 country.

9 Q. Why specifically the US as
10 opposed to any other country?

11 A. Everybody wants to come to the
12 great America.

13 Q. You mentioned a visa, a travel
14 visa. What type of travel visa?

15 A. I am not exactly sure. It could
16 have been B1 or B2. It was a visitors
17 visa. Exactly what type it is it has been
18 so long.

19 MR. BALKEN: Let me help you
20 out. Let's go to Exhibit A.

21 Q. Ms. Williams, are you able to
22 see the document on the screen right now?

23 A. Yes, I can.

24 Q. I believe you're able to
25 scroll --

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2 (Speaking simultaneously.)

3 MR. BALKEN: This was produced
4 by your counsel as -- I mean, it was
5 inserted as Bates number 100, because
6 it was between 99 and 101. It does
7 not actually have a Bates number in
8 it, but we can stipulate that it is.

9 Q. Do you recognize this document,
10 Ms. Williams?

11 A. Yes, I do.

12 Q. What is this document?

13 A. It's a copy of my Jamaican
14 passport.

15 Q. Is this not a visa?

16 A. A copy of Jamaican passport with
17 United States visa stamp on it.

18 Q. Does this display the visa that
19 you just mentioned you used for travelling
20 to the US in or about 1991?

21 A. What was the question?

22 MR. BALKEN: Elizabeth, read
23 back the question.

24 (Requested testimony was read.)

25 A. Yes, it does.

1 C. WILLIAMS CONFIDENTIAL

2 Q. If you see on the right there,
3 visa type, class.

4 Do you see that?

5 A. Yes.

6 Q. What does it say what type of
7 class is it?

8 A. It says B1, B2. That's what it
9 says.

10 Q. It says issue date.

11 What is the issue date?

12 A. February 1991.

13 Q. Does this refresh your memory
14 when you travelled to the US?

15 A. Yes.

16 Q. Was it in or about February 4,
17 1991?

18 A. Whatever the stamp says there
19 that's when I travelled to the US.

20 Q. If you look next to the right of
21 that it has an expiration date of
22 February 4, 1992.

23 Do you see that?

24 A. Yes.

25 Q. How long were you in the US

1 C. WILLIAMS CONFIDENTIAL

2 after you travelled using the visa?

3 A. How long was I -- I am still
4 here.

5 Q. You never left the US since you
6 travelled in or about February 5, 1991, to
7 the US?

8 MR. BERNSTEIN: Objection.

9 A. What exactly are you asking? If
10 I left the United States between March 5,
11 1991, and now? Is that what you are
12 asking?

13 Q. Yes, February.

14 A. Of course. I left the US
15 multiple times, yes.

16 Q. Did you reside in the US since
17 that time, February 5, 1991?

18 A. I am not sure. I don't know. I
19 don't remember if that's my first travel
20 or my second travel.

21 So I cannot specifically answer
22 the question. I know the first time I
23 went back home I came back again. I am
24 not sure if this was the first visit or
25 the second visit.

1 C. WILLIAMS CONFIDENTIAL

2 Q. When you came back that other
3 time was that also between this period
4 February 5, 1991 and --

5 A. I would have to see my visa, the
6 passport.

7 Q. Did you have a different travel
8 visa than this one?

9 A. I would have to -- that's the --
10 I don't know.

11 Q. You don't know?

12 A. The visa is usually the
13 passport. For me to give you an exact
14 answer I would have to open my passport
15 and look at the visa that was issued and
16 how many times I travelled on the visa.

17 The stamps -- every time I would
18 come in they would stamp me upon arrival
19 and I would be stamped on departure.

20 So --

21 Q. Did you have any other visas
22 other than this one?

23 A. I am not sure. That's what --
24 as I said before, I can't recall if this
25 was the first issuance or second issuance.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Okay. But you recall there were
3 two issuances?

4 A. I think so.

5 MR. BALKEN: I am calling for
6 the production for the other visa to
7 the extent --

8 THE WITNESS: Let me just say
9 this for correction. You don't have
10 to have two visas for two visits.

11 That's not exactly what I am
12 saying a visa, but I am not saying I
13 am not sure if this was my first
14 travel of my second travel.

15 Q. Are you saying that you may have
16 travelled using this visa twice?

17 A. Yes, it's possible.

18 Q. But you don't recall?

19 A. I don't recall. You see how
20 long ago, 1991.

21 Q. Did you ever change your visa
22 status?

23 A. Be a little more specific,
24 please.

25 Q. Did you ever apply to change

1 C. WILLIAMS CONFIDENTIAL

2 your visa status from B1, B2?

3 A. I have applied for residency
4 from being a visitor to be permanent
5 resident if that's what you're asking.

6 I never put in visa numbers.
7 That's not my prerogative to do.

8 Q. When did you make that
9 application --

10 A. For?

11 Q. To switch -- to make that switch
12 that you just mentioned?

13 A. That was in -- when was that.
14 2013 or 2014. Maybe somewhere around
15 there. I don't have my documents on me.
16 I don't have those things. I don't know.

17 It could have been -- well, I
18 don't have my passport with me. Probably
19 sometime -- anywhere between 2012 and
20 2014. Somewhere around there.

21 MR. BALKEN: I am going to call
22 for production of this application to
23 the extent it is in Ms. Williams'
24 possession.

25 MR. BERNSTEIN: Follow up in

1 C. WILLIAMS CONFIDENTIAL

2 writing.

3 Q. Other than that, Ms. Williams,
4 have you made any other applications to
5 change your visa status?

6 A. What are you asking me?

7 Q. Have you made any other
8 applications to change your visa status
9 from B1, B2 to something else other than
10 the one you just described?

11 A. I have made application to
12 change to permanent resident and permanent
13 resident to United States citizen.

14 Q. Other than that what you
15 described in or around 2012 or later, have
16 you made any other application to change
17 your B1, B2 visa status?

18 A. 2012 and later I made
19 application to change the permanent
20 resident to United States citizen only.

21 Q. And nothing before this; is that
22 right?

23 A. I don't recall.

24 Q. Okay. You said you don't recall
25 whether there was another visa --

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2 MR. BALKEN: Strike that
3 question.

4 Q. You mentioned how you travelled
5 twice using a visa, a travel visa.

6 Where were you after those two
7 travels? Were you in the US or were you
8 elsewhere?

9 A. You got to be specific. I am
10 not sure what you're asking me. Are you
11 talking about my arrival in the US?

12 Q. Let's break it down.

13 You travelled to the US once
14 using the travel visa in or around 1991,
15 correct?

16 A. I see it on screen, yes.

17 Q. You then travelled back to
18 Jamaica in or around that time?

19 A. I believe so. It's possible.

20 Q. Approximately within a year; is
21 that right?

22 A. Like I said, I can't give any
23 specifics on this because when I am
24 looking at it I am not sure if it's my
25 first visit or my second visit.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Right. To the extent you can
3 recall the space in time between your
4 first and second visits?

5 A. I really don't know. I have --
6 (Speaking simultaneously.)

7 THE COURT REPORTER: Only one
8 person can speak at a time. I did not
9 hear the end of her answer.

10 Q. Do you have anything to add, Ms.
11 Williams?

12 A. Unless I have my passport in
13 front of me I cannot give you any specific
14 dates to travel time and duration between
15 each travel.

16 So you're asking me something
17 that I don't know. It's in --

18 Q. This wasn't your passport?

19 A. What?

20 Q. This wasn't your passport?

21 A. You -- didn't you ask me if my
22 passport and I told you yes, sir.

23 Q. Well, you just said you need to
24 have your passport in front of you or you
25 can't answer the question.

1 C. WILLIAMS CONFIDENTIAL

2 MR. BERNSTEIN: Objection. I
3 believe she is referring to the entire
4 document, not the page that's in front
5 of her.

6 Q. To your knowledge, did any
7 documents authorize you to be in the
8 United States between 1992 -- February, 4,
9 1992, and the time that you made that
10 application in or about 2012?

11 A. Repeat your question, please.

12 MR. BALKEN: Can you read back
13 the question.

14 (Requested testimony was read.)

15 MR. BERNSTEIN: Objection.

16 It looks like we've lost the
17 witness.

18 MR. BALKEN: No, she is not
19 answering.

20 THE WITNESS: You want me to
21 answer?

22 MR. BERNSTEIN: Please do.

23 A. No, sir.

24 Q. Did you reside in the US during
25 that period?

1 C. WILLIAMS CONFIDENTIAL

2 A. Yes, I did.

3 Q. Were you lawfully residing in
4 the US during that period?

5 MR. BERNSTEIN: Objection. You
6 can answer.

7 A. I overstayed my visa if that's
8 what you're asking me.

9 Q. For how long?

10 A. Until I got my permanent
11 residence.

12 Q. You said that was -- that you
13 made the application was in or about 2012
14 at the earliest, correct?

15 A. I said between 2012 and 2014.

16 Q. Okay.

17 When did you -- when did you
18 apply to work for Harry's Nurses Registry?

19 A. I don't have the document in
20 front of me.

21 Q. To the best of your
22 recollection?

23 A. What it says on his application.
24 I believe -- was it 2007? I don't know.
25 I can't recall. I can't remember the

1 C. WILLIAMS CONFIDENTIAL

2 exact year.

3 Q. Was it before you obtained your
4 permanent residency?

5 A. Yes.

6 Q. Were you not lawfully residing
7 in the country when you applied to work
8 for Harry's Nurses Registry?

9 A. I was here on visitors visa that
10 I overstayed.

11 Q. So yes?

12 A. I was here on visitors visa that
13 I overstayed.

14 Q. Were you lawfully authorized to
15 work in the US when you worked for Harry's
16 Nurses Registry?

17 A. I was here on a visitors visa
18 that I overstayed.

19 Q. So you were not lawfully
20 authorized to work in the US when you
21 worked for Harry's Nurses Registry?

22 A. I was here on a visitors visa
23 that I overstayed.

24 Q. Is that the extent of your
25 answer?

1 C. WILLIAMS CONFIDENTIAL

2 A. That is the extent of my answer.

3 Q. Are you refusing to answer the
4 question or --

5 MR. BERNSTEIN: Ms. Williams, he
6 asked you a yes or -- a question that
7 can be answered with yes or no.

8 You can answer with yes or no.

9 Elizabeth, can you repeat the
10 question, please.

11 (Requested testimony was read.)

12 MR. BALKEN: With her attorney's
13 understanding in the back of her mind.

14 A. That's correct.

15 Q. How did you obtain work for
16 Harry's Nurses Registry?

17 A. I applied.

18 Q. In your application did you
19 indicate that you were not lawfully
20 authorized to work in the US at that time?

21 A. I did not put anything. I did
22 not check anything on the form.

23 Q. Do you remember whether there
24 was a place to do that?

25 A. Yes, I recall, but I did not

1 C. WILLIAMS CONFIDENTIAL

2 check anything.

3 Q. So you recall that you
4 intentionally left that blank?

5 A. I recall that the -- I did not
6 check anything.

7 Q. And you recall there was a space
8 to check whether you were lawfully
9 authorized to work in the US, correct?

10 A. Yes, I do recall.

11 Q. So you said you stayed after the
12 visa expired. Then how did you obtain
13 your permanent --

14 A. I have applied to immigration.

15 MR. BALKEN: I am going to call
16 for the production of that
17 application.

18 MR. BERNSTEIN: Follow up in
19 writing, please.

20 MR. BALKEN: Ms. Williams, do
21 you need a minute? Should we take a
22 break?

23 MR. BERNSTEIN: Ms. Williams,
24 are you ready to proceed?

25 THE WITNESS: Yes. I answered

1 C. WILLIAMS CONFIDENTIAL

2 his question.

3 You have the document on the
4 screen.

5 MR. BERNSTEIN: Ms. Williams, if
6 you could tilt your phone so we can
7 see your whole face.

8 Q. Did you indicate in any way in
9 your application to Harry's Nurses
10 Registry that you were lawfully authorized
11 to work in the US?

12 A. I think I already answered that
13 question.

14 MR. BERNSTEIN: She did.

15 MR. BALKEN: Please answer the
16 question that is pending. Your
17 objection is noted if you're going to
18 insert it.

19 A. What was the question?

20 MR. BALKEN: Elizabeth, read
21 back the question.

22 (Requested testimony was read.)

23 A. The first part of the question.

24 MR. BALKEN: Can you read it
25 again.

1 C. WILLIAMS CONFIDENTIAL

2 (Requested testimony was read.)

3 A. I don't know exactly what you're
4 asking, but I did complete the form. I
5 did not check anything. So I am not sure
6 what you're asking.

7 Q. What was the basis in your
8 application for immigration?

9 MR. BERNSTEIN: Objection.

10 MR. BALKEN: Strike the
11 question.

12 Q. What was your basis for being
13 granted permanent residence --

14 MR. BERNSTEIN: Objection.

15 Q. -- in your application?

16 A. What do you mean? Clarify your
17 question or explain your question --

18 (Speaking simultaneously.)

19 Q. In your application for
20 permanent residence what was the basis
21 presented therein for why you should be
22 granted permanent residence?

23 MR. BERNSTEIN: Objection.

24 A. I don't know. I don't have the
25 application in front of me.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Was it because you were working
3 in the US?

4 A. I did not apply for residence
5 through work.

6 Q. What did you apply for residence
7 through?

8 A. Just to change my status.

9 Q. Did you use your marital status
10 as a basis to obtain permanent residence?

11 A. No, I did not.

12 Q. Do you recall what you did use?

13 A. I received my permanent
14 residence, and my son applied for me if
15 that's what you're asking.

16 Q. Do you know what the contents of
17 that application that he filed for you?

18 A. No, I don't know.

19 Q. Do you know whether the contents
20 in that application were true?

21 A. I am sure it was true. What are
22 you insinuating?

23 Q. How do you know it was true?

24 A. Mr. Mark Fish was my attorney
25 who filed my application for me. He was

1 C. WILLIAMS CONFIDENTIAL

2 located in Manhattan, New York. Broadway.

3 If I --

4 Q. Was --

5 A. If I know anything about
6 Mr. Fish he would never file a false
7 application. Neither would he put
8 anything that is false in application.

9 Q. Did Mr. Fish file it or did your
10 son file it?

11 A. My son was petitioner. Mr. Fish
12 filed the application.

13 Q. What did your son file?

14 A. For his mother to become a
15 permanent resident.

16 Q. Apologies. It seems like you're
17 testifying that both Mr. Fish and your son
18 filed the application for you?

19 MR. BERNSTEIN: She's testifying
20 that Mr. Fish acted as her son's agent
21 and performed the mechanical task of
22 filing the application with the
23 immigration authorities.

24 MR. BALKEN: That was not my
25 understanding from her testimony.

1 C. WILLIAMS CONFIDENTIAL

2 MR. BERNSTEIN: Reread the
3 testimony because it was clear.

4 MR. BALKEN: It has been coached
5 to be that testimony as for now.
6 There is no point of asking the
7 question. Note my objection to that.

8 Q. You mentioned you have a Social
9 Security number.

10 Can you please state it for the
11 record which is confidential.

12 A. 125-82-9064.

13 Q. When did you obtain that Social
14 Security number?

15 A. In 1994.

16 Q. How?

17 A. I applied for it.

18 Q. When?

19 A. In 1994.

20 MR. BALKEN: I am going to call
21 for the production of that
22 application.

23 THE WITNESS: I don't have it.

24 MR. BERNSTEIN: Taken under
25 advisement.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Why don't you have it?

3 A. Do I have to answer that
4 question?

5 MR. BERNSTEIN: Yes.

6 A. It was in 1994.

7 MR. BALKEN: Can you repeat that
8 last question and answer.

9 (Requested testimony was read.)

10 Q. I don't think you answered the
11 question.

12 A. What was your question?

13 Q. Why don't you have it?

14 A. Why I don't have it what, the
15 application for the Social Security
16 number?

17 Q. Yes.

18 A. Because I don't have it. Do you
19 have an application -- I'm sorry.

20 Q. Did you have copies that you
21 disposed of?

22 A. I moved several times from where
23 I was living -- where I was living. I
24 don't remember. I moved several times.

25 Q. How many times have you moved?

1 C. WILLIAMS CONFIDENTIAL

2 A. I don't know. A lot.

3 Q. More than 30?

4 A. I don't -- I don't know. I
5 don't know if I moved more than 30 times.
6 Okay.

7 I've moved several times over
8 the years. So I don't have the
9 application for Social Security number,
10 and even when you apply for Social
11 Security number you give them application
12 there is no copy that is kept back. The
13 form is presented to the Social Security
14 office. They keep it. They never give
15 you a copy back.

16 Q. So you never had a copy of it?

17 A. You just heard what I said,
18 right? When an application is made to the
19 Social Security office the form is
20 presented to the office and the office
21 keeps the form.

22 Q. I understand that's generally
23 how it's done according to your
24 understanding --

25 A. I didn't make --

1 C. WILLIAMS CONFIDENTIAL

2 Q. Did they give you a copy?

3 A. I don't have a copy of it. I
4 don't recall having a copy of it.

5 Q. Ever?

6 A. I don't recall having a copy of
7 it.

8 Q. Do you recall ever having a copy
9 of it?

10 A. I don't recall having a copy of
11 it.

12 Q. Who submitted the application
13 for you?

14 A. I submitted my application
15 myself. I did not go to the Social
16 Security office to apply for my initial
17 Social Security number. I don't recall
18 going there.

19 I applied for what's called
20 employment authorization. Everything was
21 done at the same spot, the same office.

22 Q. You applied for your Social
23 Security number through an employment
24 application?

25 A. Like I said, when I applied for

1 C. WILLIAMS CONFIDENTIAL

2 my work authorization the application was
3 done for work authorization and Social
4 Security number.

5 After I received my work
6 authorization the Social Security card was
7 mailed to me. Since -- if I might add,
8 that since I became Williams, my name
9 changed from Gayle, I went to my local
10 Social Security office and have my name
11 changed on my Social Security card.

12 When I became a US citizen I did
13 that and I went to the office and I have
14 no copies of anything.

15 I presented documents to them.
16 They accept the documents, made the
17 change, and that was it.

18 Q. When did you apply for work
19 authorization?

20 A. The first time I applied for
21 work authorization was in 1994.

22 Q. Was it accepted?

23 A. Yes, it was.

24 Q. Did you -- did you apply after
25 that?

1 C. WILLIAMS CONFIDENTIAL

2 A. I applied. Yes, I got that in I
3 think was 2014. Either 2014 or 2013.

4 Q. Why did you apply a second time?

5 A. Because I needed to because it
6 is good for six months.

7 Q. The work authorization is only
8 good for six months you said?

9 A. Yes.

10 Q. And the second time you applied
11 was for that six-month duration as well?

12 A. Yes.

13 Q. Were you eligible to apply for
14 work authorization when you applied in
15 1994?

16 MR. BERNSTEIN: Objection. You
17 can answer.

18 A. How do you become eligible to
19 apply for work authorization?

20 Q. Do you know?

21 A. You tell me, because I don't
22 know how to answer that question, because
23 I think anyone can apply for it. I don't
24 have specific eligibility.

25 Q. Were you married at the time you

1 C. WILLIAMS CONFIDENTIAL

2 made that work authorization in 1994?

3 MR. BALKEN: Strike that.

4 Q. Were you married at the time you
5 made that work authorization application
6 in 1994?

7 A. If I was married or if I was --
8 what was -- I'm sorry. State the question
9 again, please.

10 Q. Were you married at the time you
11 made the work authorization application in
12 1994?

13 A. No, I was not.

14 Q. Were you lawfully employed in
15 the US at the time you made the work
16 authorization application in 1994?

17 MR. BERNSTEIN: Objection. You
18 can answer.

19 A. I don't recall having any
20 employment at that time.

21 MR. BALKEN: I am going to
22 request production of the work
23 authorization application to the
24 extent your client is able to obtain
25 that.

1 C. WILLIAMS CONFIDENTIAL

2 THE WITNESS: I will not be able
3 to --

4 MR. BERNSTEIN: Follow up in
5 writing.

6 Q. Who would have copies, if
7 anyone, of your work authorization
8 applications?

9 A. The Social Security --
10 immigration.

11 Q. Anyone else?

12 A. Immigration.

13 Q. Any attorneys?

14 A. Immigration.

15 Q. The same question for your
16 Social Security number application.

17 A. The Social Security
18 administration would have copies and the
19 application and every record.

20 Q. The same question for your
21 immigration application?

22 A. The immigration would have it as
23 well.

24 Q. Mr. Fish wouldn't have it?

25 A. I am sure he would. He has

1 C. WILLIAMS CONFIDENTIAL

2 since retired. I think he moved back to
3 Israel.

4 Q. You're not able to contact Mr.
5 Fish?

6 A. No, I tried. They told me they
7 bought the practice from him.

8 Q. They did not have the record?

9 A. I did not ask them.

10 Q. But you're able to ask them --

11 A. No, I am not. Why would they
12 have it? They didn't do anything for me.
13 He wasn't working on anything for me.

14 Q. Can you repeat that answer.

15 A. Mr. Fish has retired. I believe
16 he retired to Israel.

17 Q. And his records wouldn't remain
18 with his law firm?

19 A. He sold his practice. That was
20 my understanding that he sold the
21 practice.

22 Q. What law firm were you referring
23 to before when you said his law firm?

24 A. He had -- Mr. Fish has --
25 Mr. Fish had his own law firm at the time

1 C. WILLIAMS CONFIDENTIAL

2 when he filed my immigration papers.

3 Since then, since I got my
4 citizenship, my last application, my last
5 time he worked for me he has retired and
6 he has sold his practice.

7 Q. What law firm did you contact as
8 you mentioned before?

9 A. I didn't contact any law firm.
10 I called the number I had for Mr. Fish and
11 I was told he was no longer there.

12 Q. Who told you that?

13 A. Whoever answered the phone. I
14 don't know their name. I did not ask.

15 Q. Someone answered the phone of a
16 former number for Mr. Fish and they say --
17 they represented it was a law firm and
18 told you Mr. Fish was no longer there; is
19 that correct?

20 A. I called the number. I asked
21 for Mr. Fish. They said Mr. Fish is no
22 longer here. He has retired and sold the
23 practice.

24 Q. Do you know the number off the
25 top of your head?

1 C. WILLIAMS CONFIDENTIAL

2 A. No, I don't.

3 Q. Can you give us that number --

4 A. I don't. You can Google it.

5 Q. What's the name of the attorney?

6 A. Mark Fish, and Mark Fish -- or
7 Mark Fish and Associates. I am not sure.

8 Q. With an M or with a C?

9 A. What?

10 Q. How do you spell his name?

11 A. M-A-R-K.

12 Q. How do you spell fish?

13 A. Like Fish.

14 Q. It's your testimony that you
15 Googled Mark Fish and Associates or Mark
16 Fish we are going to be able to find his
17 number?

18 MR. BERNSTEIN: Objection.

19 A. Yes.

20 MR. BALKEN: We are going to
21 call for production of the number.

22 I think your client knows it or
23 has access to it. I don't see any
24 basis to object to this.

25 MR. BERNSTEIN: Well, there's no

1 C. WILLIAMS CONFIDENTIAL
2 time for interrogatories remaining in
3 this case is the --

4 MR. BALKEN: Well, we have
5 discovered this in a deposition. We
6 are totally in our right to seek
7 further discovery based on the
8 deposition.

9 MR. BERNSTEIN: Taken under
10 advisement.

11 Q. When did you get married to Mr.
12 Williams?

13 A. June 10, 2018. It was a
14 beautiful wedding.

15 Q. When did you get married to Mr.
16 Mathias?

17 A. Sometime in the past.

18 Q. Do you recall --

19 A. No, I don't.

20 Q. -- at all?

21 A. No.

22 Q. Was it in the 1990s?

23 A. I am sure it was.

24 Q. It was after 1994, right?

25 A. It was after 1994, yes.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Do you know what date of the
3 year your anniversary was?

4 A. For?

5 Q. For your marriage with
6 Mr. Mathias?

7 A. No.

8 Q. How many years were you married
9 to him for?

10 A. It was short lived. I don't
11 know. I don't know if it was a year. I
12 don't know. I don't remember.

13 Q. You don't know if it was more
14 than a year?

15 A. I really don't. I am being
16 honest with you. It was short lived like
17 I said. It's not significant to me.

18 Q. Do you have a marriage
19 certificate with your marriage to Mr.
20 Mathias?

21 A. No, I do don't.

22 Q. Did you ever have one?

23 A. I don't know. Probably. I
24 don't know.

25 MR. BALKEN: I will call for

1 C. WILLIAMS CONFIDENTIAL
2 production of that marriage
3 certificate to the extent your client
4 has possession, custody, or control.

5 MR. BERNSTEIN: Taken under
6 advisement.

7 THE WITNESS: I don't know what
8 this has to do with anything.

9 MR. BALKEN: Let's go to Exhibit
10 B. We have on the screen here -- it
11 was produced by both parties actually.

12 This is Plaintiff's Bates number
13 187. Although, like the prior
14 document, I don't think the Bates
15 number is indicated on the document.

16 We are just figuring it out
17 based on where it was spaced in the
18 production.

19 MR. BERNSTEIN: Sorry to
20 interrupt. I discovered after the
21 fact that something about the
22 software. It has a hard time stamping
23 Bates number on JPEG. The Bates
24 numbers are correct.

25 Q. Do you recognize this document?

1 C. WILLIAMS CONFIDENTIAL

2 A. Yes, I do.

3 Q. What is it?

4 A. My New York state driver's
5 license I guess, yes.

6 Q. It's when you had the name --
7 last name Mathias, correct?

8 A. Yes.

9 Q. You were still married to Mr.
10 Mathias at the time you obtained this
11 driver's license, correct?

12 A. I would assume so.

13 Q. But do you recall?

14 A. Recall what, that I was married
15 to him? Yes, I recall.

16 Q. Obtained this driver's
17 license --

18 A. If I recall when I obtained the
19 driver's license?

20 Q. Let me rephrase the question.

21 Do you recall being married to
22 Mr. Mathias at the time you obtained this
23 driver's license?

24 A. I would think so, yes.

25 Q. You're saying you would think

1 C. WILLIAMS CONFIDENTIAL

2 so, but do you recall?

3 A. I don't know what you're trying
4 to ask me because you have my driver's
5 license with my name on it as Mathias at
6 the time I was married to Mr. Mathias.

7 So it is possible that I could
8 have been married to him at that time, or
9 I could have been divorced from him and
10 probably still used the name because it
11 wasn't changed. I don't know.

12 Q. So you don't know?

13 A. Oh, god. You're asking me about
14 things many years ago. Like I said, that
15 marriage is not significant to me. So I
16 don't have any -- much of a recollection
17 about it, except that I was married to
18 him. It was short lived. That was it.

19 Q. I understand. So you don't
20 know?

21 A. Don't know what? I --

22 Q. Whether you were married to him
23 at the time you obtained this driver's
24 license?

25 A. I don't recall. It's possible.

1 C. WILLIAMS CONFIDENTIAL

2 Like I said, I don't recall.

3 Q. Do you know what address you
4 resided at when you were with Mr.
5 Mathias?

6 A. The same address that you have
7 on there I believe.

8 Q. 225-41 Murdock Avenue, Queens
9 Village, New York?

10 A. That's correct. Yes.

11 Q. Did you reside at any other
12 addresses together with Mr. Mathias when
13 you were --

14 A. No.

15 Q. Did you reside with at any
16 address with Mr. Mathias before you were
17 married to him?

18 A. Before I was married to him?

19 Q. Yes.

20 A. No.

21 Q. Did anyone else reside at this
22 address with you and Mr. Mathias when you
23 were married to him?

24 A. My children.

25 Q. Anyone else?

1 C. WILLIAMS CONFIDENTIAL

2 A. You asked me a question. I
3 answered it. I said my children.

4 Q. I am asking you anyone else
5 other than your children?

6 A. No.

7 Q. Did you reside at this address
8 when you were not married to Mr. Mathias?

9 A. Yes.

10 Q. Before you were married to him?

11 A. I purchased that property
12 probably in 1997. Around that time I have
13 been living there.

14 Q. Did you live there after you
15 were no longer married to Mr. Mathias?

16 A. Yes, I believe -- I believe -- I
17 believe so. I cannot give you exact
18 details or more specific details.

19 Q. Was this the home of your uncle?

20 A. No.

21 THE COURT REPORTER: I would
22 like to take five minutes.

23 MR. BALKEN: Sure.

24 (A recess was taken.)

25 Q. After you obtained permanent

1 C. WILLIAMS CONFIDENTIAL

2 residence did your authorization to work
3 in the US was it ever lost or suspended?

4 A. No.

5 Q. At any time after you obtained
6 authorization to work in the US was it
7 ever suspended or lost?

8 A. No.

9 Q. What is your current residence
10 address?

11 MR. BALKEN: Strike that.

12 Q. How long have you resided at the
13 address that you provided to the reporter
14 in the beginning of this deposition?

15 A. Since the fall of 2006.

16 Q. What address did you reside at
17 before then?

18 A. I don't know. Probably Upstate
19 New York. I don't know. I was in Bronx.
20 I was in New York. It was a New York
21 address.

22 Q. You don't recall what the
23 address is?

24 A. No, I don't. It's probably in
25 the Bronx.

1 C. WILLIAMS CONFIDENTIAL

2 Q. In the Bronx or Upstate New
3 York?

4 A. I think it was the Bronx.
5 Before the Bronx it was Upstate New York,
6 but it was the Bronx.

7 Q. How long were you at that
8 address?

9 A. In the Bronx?

10 Q. Yes.

11 A. I don't know. I went there
12 after I graduated from my LPN program. I
13 was there until I moved to Georgia.

14 Q. Approximately when did you
15 graduate from your LPN program?

16 A. I think it was June of 2006 I
17 believe.

18 Q. Where did you reside at before
19 then?

20 A. Upstate New York.

21 Q. Where in Upstate New York?

22 A. Mountaindale.

23 Q. Can you give the full address?

24 A. No, I can't. It was on Main
25 Street. I don't know the full address.

1 C. WILLIAMS CONFIDENTIAL

2 Q. For how long were you at that
3 address on Main Street?

4 A. I don't remember.

5 Q. More than five years?

6 A. I don't think so.

7 Q. More than 10 years?

8 A. No --

9 (Speaking simultaneously.)

10 Q. More than two years?

11 A. Probably.

12 Q. Where were you at before that
13 address?

14 A. Florida.

15 Q. Where in Florida?

16 A. Orlando.

17 Q. Do you recall the exact address?

18 A. No, sir.

19 Q. Do you recall the neighborhood?

20 A. No. It could have been -- no.

21 Probably Albion Springs. I am --

22 (Speaking simultaneously.)

23 Q. Approximately for how long were
24 you at that address?

25 A. Maybe a year or two.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Where were you before that?

3 A. I don't know. Somewhere in New
4 York.

5 Q. Any idea what city in New York?

6 A. Queens at Murdock Avenue. I was
7 living at Murdock Avenue before I went to
8 Florida in 2000.

9 In 1999 rather. I think.
10 That's what I am saying. I left -- I went
11 to Florida in 2000.

12 I lived at Murdock Avenue -- I
13 bought the house in 1997 and I moved to
14 Florida in 2000. Something like that.

15 Q. Where were you before that?

16 A. I don't know. Somewhere
17 in Queens.

18 Q. Do you know what neighborhood in
19 Queens?

20 A. No.

21 Q. Do you know what street?

22 A. No.

23 Q. For how long were you there?

24 A. I don't know.

25 Q. No idea?

1 C. WILLIAMS CONFIDENTIAL

2 A. No.

3 Q. More than a year?

4 A. I don't know.

5 Q. Do you know if it was more than
6 10 years?

7 A. I don't know. I didn't live
8 anywhere for 10 years accept where I am
9 living right now.

10 Q. Was it more than six years?

11 A. Sir, I don't recall.

12 Q. Do you recall if it was more
13 than a month?

14 A. I am sure it was.

15 Q. Do you recall was it more than
16 five months?

17 A. Probably.

18 Q. Do you recall if it was more
19 than nine months?

20 A. Oh, god. Are you doing this on
21 purpose? I don't know. I don't recall.

22 Q. Before that where did you
23 reside?

24 A. I don't recall. I don't recall.

25 Q. These are all permanent

1 C. WILLIAMS CONFIDENTIAL

2 addresses, but between the -- like during
3 this period you were at these other
4 addresses you resided at other temporary
5 addresses, correct?

6 A. No. I don't know what you're
7 saying is correct. Everywhere I lived was
8 supposed to be permanent -- happen to be
9 short, but it doesn't mean -- I did not
10 move somewhere to be --

11 Q. Let me clarify the question.
12 While you were living at these addresses
13 we just discussed did you have any other
14 temporary addresses where you resided?

15 A. What does this have to do with
16 Harry posting my personal information?

17 MR. BERNSTEIN: You have to
18 answer the question.

19 THE WITNESS: Seriously. Why
20 are you annoying me with all these
21 questions? That's all irrelevant to
22 the case.

23 MR. BERNSTEIN: We have to
24 comply with the court rules by
25 answering these questions.

1 C. WILLIAMS CONFIDENTIAL

2 Please, answer the questions.

3 A. What's your question?

4 MR. BALKEN: Can you read back
5 the question.

6 (Requested testimony was read.)

7 A. I don't know. Probably maybe or
8 maybe not.

9 Q. You don't recall?

10 A. I don't recall.

11 Q. What is your phone number?

12 A. Which one?

13 Q. All of them.

14 A. 770-866-5217.

15 Q. And?

16 A. Nothing else.

17 Q. You have no other phone numbers?

18 A. No.

19 Q. Why did you ask me which one
20 when I --

21 A. Because I don't know if you want
22 the correct one or the previous ones like
23 you've been asking about previous
24 addresses.

25 Q. Thanks for clarifying. I do

1 C. WILLIAMS CONFIDENTIAL

2 want your previous phone numbers.

3 A. I don't know them.

4 Q. You don't recall any of them
5 accept for the one you just gave me?

6 A. Only the one I just give you I
7 recall. The one that started with 347, I
8 don't know the rest of the numbers.

9 Q. Approximately how many phone
10 numbers have --

11 A. I don't know.

12 Q. Please let me finish the
13 question.

14 Approximately how many phone
15 numbers have you had since travelling to
16 the US?

17 A. I can't recall. I can't recall.

18 Q. Do you recall if it was more
19 than three?

20 A. I can't recall.

21 Q. Do you recall if it was more
22 than 20?

23 A. I can't recall.

24 Q. Okay. If you saw these phone
25 numbers --

1 C. WILLIAMS CONFIDENTIAL

2 MR. BALKEN: Strike that.

3 Q. Have you ever filed for
4 bankruptcy?

5 A. Yes, I have.

6 Q. How many times?

7 A. I think about two times.

8 Q. When?

9 A. The last time I think was in --
10 Mr. Bernstein, do you remember
11 when we go the judgment from Harrys? It
12 was that year.

13 MR. BERNSTEIN: I do, but I
14 cannot answer the question.

15 A. I don't remember what year it
16 was, but it was around that time I filed
17 the last one.

18 Q. Can you approximate? Was it
19 like before 2010?

20 A. It was the year that we got the
21 judgment from Harrys.

22 Q. The in FLSA lawsuit?

23 A. Yes.

24 Q. What was your reason for filing
25 for bankruptcy at that time?

1 C. WILLIAMS CONFIDENTIAL

2 A. Because I needed to rearrange my
3 life.

4 Q. What do you mean by that?

5 A. Meaning I needed to rearrange my
6 finances.

7 Q. Why did you need to rearrange
8 your finances?

9 A. Because I needed to.

10 Q. So your answer is because?

11 A. Because I needed to. Because I
12 couldn't pay my bills.

13 Q. Is that why?

14 A. I needed to file bankruptcy.
15 That's why I filed it.

16 Q. But there was a reason why you
17 needed to file bankruptcy?

18 A. Yes, because I needed to
19 rearrange my finances.

20 Q. Why did you need to do that?

21 A. Because I needed to.

22 Q. I don't think you're answering
23 the question.

24 A. I think I have.

25 MR. BALKEN: We are going to

1 C. WILLIAMS CONFIDENTIAL

2 reserve our right to -- we are going
3 to mark that for a ruling.

4 I am not sure we are going to
5 move on it, but I want to reserve our
6 right to.

7 MR. BERNSTEIN: Taken under
8 advisement.

9 I will also note for the record
10 that the docket sheets related to the
11 Plaintiff's bankruptcy litigation have
12 been produced to you and nothing has
13 prevented you from questioning her
14 regarding the discharge petitions.

15 MR. BALKEN: That is quite a
16 long objection or whatever.

17 Q. When else did you file for
18 bankruptcy?

19 A. I don't recall. Prior to that.
20 I don't remember the exact year.

21 Q. Do you recall if it was after
22 2000?

23 A. I don't remember.

24 Q. Do you recall if it was after
25 2010?

1 C. WILLIAMS CONFIDENTIAL

2 A. I don't remember.

3 Q. Do you recall if it was before
4 1995?

5 A. It was before 1995?

6 Q. Yes.

7 A. No, it was not before 1995. I
8 know it was after 1997, but not before
9 1995.

10 Q. Do you recall if it was before
11 2015?

12 A. I think I told you when you
13 asked me the first question that the last
14 time I filed bankruptcy is when we got the
15 judgment from Harrys.

16 Q. And the time before that was
17 when?

18 A. I don't recall.

19 Q. What was your reason for filing
20 for bankruptcy that other time?

21 A. The same reason.

22 Q. And you don't recall any other
23 times other than those two times?

24 A. Those are the only two times I
25 can recall.

1 C. WILLIAMS CONFIDENTIAL

2 MR. BALKEN: Please put up
3 Exhibit C.

4 (Speaking simultaneously.)

5 I will send a copy to counsel
6 and Ms. Williams.

7 Does that work?

8 THE WITNESS: My name is
9 Mrs. Williams.

10 MR. BALKEN: I apologize. We
11 will address you as Mrs. Williams.

12 Does that work, Mrs. Williams
13 and Mr. Bernstein?

14 Off the record.

15 (A discussion was held off the
16 record.)

17 Q. This is Plaintiff's answers to
18 Defendants first set of interrogatories as
19 amended.

20 Do you know what an
21 interrogatory is?

22 A. No. Why don't you explain it to
23 me.

24 Q. Okay. Please scroll down to the
25 last page. This was actually not attached

1 C. WILLIAMS CONFIDENTIAL

2 to the interrogatory answer. It was
3 accompanying it when produced.

4 A. Which page are you on because
5 there are two or three attachments here.

6 Q. That does not make any sense.

7 MR. BERNSTEIN: There is only
8 one attachment.

9 It's called Exhibit C Williams,
10 Claudia.

11 THE WITNESS: Which page might
12 that be?

13 MR. BALKEN: The last page.

14 THE WITNESS: Okay. I am on the
15 last page.

16 MR. BALKEN: I would like you to
17 read that to yourself and let me know
18 when you are done.

19 THE WITNESS: I am done.

20 Q. Do you recognize this page?

21 A. Yes, I do.

22 Q. What is it?

23 A. It's a statement that I signed
24 and verified to.

25 Q. Right, and that is your

1 C. WILLIAMS CONFIDENTIAL

2 signature?

3 A. It is my signature.

4 Q. What were you verifying?

5 A. I have read -- the answers to
6 interrogatories.

7 Q. I am going to read what it says.
8 "I am the Plaintiff in the action. I have
9 read the foregoing answers to
10 interrogatories and know the contents
11 thereof. The same is true to my own
12 knowledge accept as to matters therein
13 stated to be alleged information and
14 believe and as to those matters I believe
15 that to be true under penalty of perjury
16 it's true and correct."

17 When you signed this were you
18 aware of what an interrogatory was?

19 A. I don't know why you choose to
20 sit her and insult my intelligence.

21 Q. You did not answer the question.

22 A. I did. What's your point?

23 Q. What is the answer to the
24 question?

25 A. What are you asking me? You can

1 C. WILLIAMS CONFIDENTIAL

2 get to your point, sir.

3 Q. At the time you signed this did
4 you know what an interrogatory was?

5 A. I said you are insulting my
6 intelligence.

7 MR. BERNSTEIN: You have to
8 answer the question.

9 A. Yes, I do. Yes, I did.

10 Q. Would you like to change your
11 testimony that you don't know what an
12 interrogatory is?

13 A. When did I say that?

14 MR. BERNSTEIN: About
15 five minutes ago.

16 THE WITNESS: Because he was
17 being obnoxious. I told him to give
18 me the pleasure of explaining it to
19 me.

20 Q. So to clarify, you didn't -- you
21 were not saying what was true to your
22 knowledge when you answered that question
23 before?

24 A. Correct. I was being facetious.

25 Q. Were you being facetious when

1 C. WILLIAMS CONFIDENTIAL

2 you answered any of the other questions in
3 this deposition?

4 A. No.

5 Q. Further to clarify, when you
6 signed this you confirmed that everything,
7 every statement in this document was true
8 to the best of your knowledge, correct?

9 A. I stated.

10 Q. If you can please go to page
11 number three.

12 Do you see number five on page
13 number three?

14 A. Number five. What -- yes.

15 Q. It says "identify all addresses
16 plaintiff has legally resided at for each
17 A, state the full address. B, state the
18 dates plaintiff resided at the address.
19 C, state the reason for change to and or
20 from the residence."

21 Do you see that?

22 A. Yes, I can see it.

23 Q. Then you have an answer and it
24 lists a bunch of properties or bunch of
25 residences, correct?

1 C. WILLIAMS CONFIDENTIAL

2 A. Yes.

3 Q. Are these all of the addresses
4 you have ever resided at?

5 A. More than likely.

6 Q. Do you recall residing -- do you
7 recall residing at any property other than
8 those listed here?

9 A. Where? In New York?

10 Q. In this answer.

11 A. That -- that was about sum it
12 up.

13 Q. Is that a yes -- yes or no
14 question?

15 A. I cannot answer with a yes or
16 no. I --

17 (Speaking simultaneously.)

18 THE COURT REPORTER: I have
19 asked several times for both of you to
20 stop speaking over each other.

21 The record is a mess.

22 MR. BALKEN: We apologize. We
23 are doing this remotely.

24 THE COURT REPORTER: Exactly why
25 it is even more important.

1 C. WILLIAMS CONFIDENTIAL

2 MR. BALKEN: Please read back
3 the last question.

4 (Requested testimony was read.)

5 A. Are you still waiting for me to
6 answer that?

7 Q. Yes.

8 A. I said I don't know.

9 Q. Thank you.

10 The first one listed is 1967 to
11 1991 --

12 MR. BALKEN: Strike that.

13 Q. The second one listed is 1991 to
14 1993, Laurelton, New York.

15 Do you recall being at this
16 address?

17 A. Yes, I do.

18 Q. Was it during this time period?

19 A. What was during this time
20 period?

21 Q. 1991 through 1993.

22 A. It's possible. That's when I
23 came to the US. That was my uncle's house
24 and we were staying there.

25 Q. Who is we?

1 C. WILLIAMS CONFIDENTIAL

2 A. I was staying there.

3 Q. With anyone else?

4 A. I was living there.

5 Q. Was anyone else living there
6 accept for you and your uncle?

7 A. My brother was living there. He
8 died.

9 Q. Just you and your brother and
10 your uncle?

11 A. Yes.

12 Q. No one else?

13 A. Just me, my brother and my
14 uncle.

15 Q. And then you moved out of there
16 after the home foreclosed or before it
17 foreclosed, correct?

18 A. I guess.

19 Q. To clarify, you moved out of the
20 home because it was being foreclosed,
21 correct?

22 A. I believe so.

23 Q. And then you went from there to
24 Ridgedale Road, Queens, New York?

25 A. Ridgedale Road or Avenue. I

1 C. WILLIAMS CONFIDENTIAL

2 don't know. Yes.

3 Q. There were no addresses in
4 between?

5 A. I don't recall.

6 Q. Was anyone at that Ridgedale
7 Road address with you between 1993 and
8 1997?

9 A. I lived there with my children.

10 Q. Anyone else?

11 A. I lived there with my children.

12 MR. BERNSTEIN: Off the record.

13 (A discussion was held off the
14 record.)

15 THE WITNESS: No, there was no
16 one else.

17 Q. Then from there you left to
18 purchase a home on Murdock Avenue,
19 correct?

20 A. I believe so.

21 Q. This is the same Murdock Avenue
22 that was displayed on this driver's
23 license we just looked at, correct?

24 A. Yes, it was. Yes, it was.

25 Q. That was 1997 through 2000,

1 C. WILLIAMS CONFIDENTIAL

2 correct?

3 A. Correct.

4 Q. So sometime between 1997 and
5 2000 you were married to Mr. Mathias,
6 correct?

7 A. I believe so.

8 Q. And sometime between 1997 and
9 2000 you had already been divorced from
10 Mr. Mathias, correct?

11 A. I am not sure.

12 Q. I say that because you testified
13 earlier that you resided at the address
14 after you had been no longer married to
15 him; is that correct?

16 A. If you recall, I was saying --
17 when you -- you asked if we -- I said I
18 purchased the property in 1997. I
19 remember moving to Florida in about 2000,
20 January maybe. Yeah, around that time.

21 So I temporarily still had the
22 house but I was in Florida. I came back
23 and the house was foreclosed. So, again,
24 I am not exactly sure.

25 When I filed for divorce from

1 C. WILLIAMS CONFIDENTIAL

2 Mr. Mathias I was living in Florida. That
3 is why I said I am not sure. There is
4 some back and forth there. I cannot
5 recall exactly.

6 Q. When you say a house in Florida
7 are you referring to the next one on the
8 list which is Curry Ford Road, Orlando?

9 A. Yes, that was -- Yes, I was
10 living, yes.

11 Q. Is it your testimony that
12 sometime between 2000 and 2003 while you
13 were living in Florida you still had a
14 residence in Murdock Avenue?

15 A. Yes, temporarily. It was
16 temporary.

17 Q. Do you recall approximately what
18 time you no longer had that address at
19 Murdock Avenue?

20 A. No, I don't. You'd have to
21 search the records. I don't.

22 Q. And then we have -- why did you
23 leave the Curry Ford Road property?

24 A. Why did I leave it?

25 Q. Yes.

1 C. WILLIAMS CONFIDENTIAL

2 A. As in why did I move again?

3 Q. Yes.

4 A. Because I had to.

5 Q. Why?

6 A. Because I couldn't pay the rent.

7 Q. And then the next property, the
8 next address you moved to after moving out
9 of Curry Ford Road that was 198 Main
10 Street, Mountindale, correct?

11 A. As I think so.

12 Q. There was nowhere in between?

13 A. Probably. I am not sure.

14 Q. You don't recall --

15 A. It's possible --

16 Q. -- correct?

17 A. It's possible.

18 Q. But to clarify, you do not
19 recall?

20 A. I do not recall.

21 Q. You then moved to Georgia, 230
22 River Crest Lane in 2006, correct?

23 A. I did, but I am sure I lived in
24 between, but as permanent addresses, yes.

25 Q. Where did you live in between?

1 C. WILLIAMS CONFIDENTIAL

2 A. I told you I was living in the
3 Bronx at one point, remember?

4 Q. You lived in the Bronx in
5 between 198 Main Street and River Crest
6 Lane, correct?

7 A. That is probably about so.

8 Q. Where in the Bronx did you live?

9 A. The address is there.

10 Q. Are you referring to 336 Fenton
11 Avenue?

12 A. Yes.

13 Q. So sometime in 2006 you moved
14 from 198 Main Street to Fenton Avenue and
15 then you moved from there to River Crest
16 Lane?

17 A. Yes, I left Upstate New York to
18 Fenton Avenue. Then I came to Georgia,
19 purchased my property and I went back to
20 New York because I am always working in
21 New York. I am always bark and forth.

22 Q. After you purchased the property
23 in Georgia you were no longer residing at
24 Fenton Avenue?

25 A. No, I -- I don't remember. I

1 C. WILLIAMS CONFIDENTIAL

2 don't recall. I probably was. I really
3 don't recall.

4 Q. Is it accurate when it says you
5 were in Fenton Avenue between 2006 and
6 2008?

7 A. Somewhere in between there. I
8 don't think it was a full two years.
9 Somewhere there.

10 Q. So it's not accurate?

11 A. The time period may not be
12 accurate, but like I said, after I
13 purchased the property in Georgia I was
14 always in New York working.

15 So I rent a room here, rent a
16 room there. I don't recall all of it. I
17 needed somewhere to stay so I had to rent
18 rooms for a period of time.

19 I might have lived somewhere for
20 three months. I work. I come back home.
21 I go back to New York. I work again. So
22 I have to find somewhere to live.

23 If it's empty I will probably
24 rent it again. If it is not empty then I
25 find somewhere else. I don't know. I

1 C. WILLIAMS CONFIDENTIAL

2 don't recall. It wasn't an ongoing thing.

3 I was a travelling nurse.

4 Q. Other than Fenton Avenue, were
5 you at any other temporary or permanent
6 addresses between 198 Main Street and 230
7 River Crest Lane?

8 A. I can't recall. I don't
9 remember.

10 Q. Who resided with you at Curry
11 Ford Road?

12 A. Let me say this for the record,
13 everywhere I lived it's me and my children
14 only. No one else. Moving after that.

15 Q. After where?

16 A. After Murdock Avenue.

17 Q. Okay.

18 So you're not currently residing
19 with Mr. Williams?

20 A. I am currently -- my children
21 are grown. They're gone. I am living
22 with my husband.

23 Q. Okay. Have you resided with
24 anyone other than your husband and/or your
25 children since Murdock Avenue?

1 C. WILLIAMS CONFIDENTIAL

2 A. No.

3 Q. Thank you.

4 Then why did you -- why did you
5 leave Fenton Avenue; it was a short
6 duration?

7 A. I think if you're looking at the
8 document you will see what it says. It says
9 temporary address worked in New York.

10 Remember what I said before. Do
11 you know what I just say before? I was a
12 travelling nurse. So every time I come to
13 New York I needed to find a room to rent.

14 I would rent a room. I would
15 work for the duration of the time and I
16 would leave and come back home.

17 Q. Is the same reason you left
18 Fenton Avenue -- that's the same reason
19 you left 785 Baldwin Avenue, Baldwin,
20 correct?

21 A. Yes. I stayed for a while.
22 That was my brother's house. That -- I
23 stayed there for a while working here,
24 yes.

25 Q. Did your brother reside there at

1 C. WILLIAMS CONFIDENTIAL

2 the same time as you did?

3 A. At that time, yes. He wasn't
4 always there, but, yes it was his house.

5 Q. Okay. Did anyone reside with
6 you at 4 Sage Road other than -- other
7 than your children?

8 A. 4 Sage Road was just passing
9 through. That wasn't my property. It was
10 my church brother and his wife who lived
11 there.

12 We just temporarily -- I
13 temporarily stayed with them while I was
14 working and then -- it wasn't for long.
15 Probably a weekend or two every so often,
16 but between that period of time for the
17 years because I was always there. I
18 stayed there sometime between there and
19 the Bronx.

20 Q. So you stayed with your church
21 brother and his wife --

22 A. Yes.

23 Q. -- at 4 Sage Road?

24 A. Yes.

25 Q. Was anyone else there?

1 C. WILLIAMS CONFIDENTIAL

2 A. I stayed with my church brother
3 and his wife. They have no one else
4 there.

5 Q. Okay. And you don't recall any
6 other -- any other places in between
7 Baldwin Avenue and Sage Road?

8 A. I don't recall.

9 Q. If we go to number six below
10 that, identify all phone numbers -- I will
11 read that slowly -- identify all phone
12 numbers ever belonging to plaintiff for
13 each -- state the full number. B, state
14 whether the phone number was for a
15 personal phone or business number.

16 C, state the dates that the
17 phone number belonged to the plaintiff.
18 D, state the reason for the change to or
19 from the phone number.

20 You answered from approximately
21 2007 to present you gave one phone number.
22 Then from 2006 to 2022 you gave a second
23 phone number. You also provided a 347
24 area code that you had at the time you
25 were -- you lived in New York; is that

1 C. WILLIAMS CONFIDENTIAL

2 correct?

3 A. That is correct.

4 Q. Okay. No other phone numbers
5 come to mind that you had?

6 A. No other phone numbers come to
7 mind that I had.

8 Q. When you say during the years
9 that you lived in New York are you
10 referring to between 2006 and 2011 only?

11 MR. BALKEN: Strike that.

12 Q. Between 2003 and 2011 only?

13 A. I don't know. I am not sure
14 what was going on in my mind at the time.

15 Q. Because you say New York --

16 A. It's possible.

17 Q. You don't know -- you don't
18 recall --

19 A. I don't recall exactly.

20 Q. If you go down to number eight,
21 it says "identify all instances where
22 plaintiff filed for bankruptcy including
23 the dates of each instance."

24 Do you see that?

25 A. Yeah.

1 C. WILLIAMS CONFIDENTIAL

2 Q. And you provided three different
3 docket numbers.

4 Do you see that?

5 A. Three different docket
6 numbers -- that's one, two, three. Okay.

7 Q. Is it true that you filed for
8 bankruptcy three times?

9 A. It's possible. Either two or
10 three times. Either two or --

11 Q. No more than that?

12 A. No more. Maybe one was -- I
13 don't know. No more than that. Either
14 two or three times. I only recall two to
15 be honest with you. It's possible. If
16 it's there it's there.

17 Q. Other the fact that it's there,
18 do you actually think that there was a
19 third time?

20 A. Like I said, it's possible.

21 Q. But you don't recall a third
22 time?

23 A. I said that before. It's
24 possible. I don't recall. It's possible.

25 Q. I understand.

1 C. WILLIAMS CONFIDENTIAL

2 A. Thank you.

3 Q. Number nine, you became a
4 citizen of the United States on November
5 8, 2019; is that true?

6 A. Yes, it is true.

7 THE COURT REPORTER: I need to
8 take a break.

9 MR. BALKEN: I don't want to
10 take a long lunch break. I would like
11 it to be as short as possible.

12 Off the record.

13 (A recess was taken.)

14 MR. BALKEN: Ms. Williams,
15 before you is Exhibit D. This was
16 produced as an Exhibit 3 to the prior
17 deposition in this case of Max
18 Rinaldi.

19 It was also produced by
20 defendants in there discovery as Bates
21 185. It was also an exhibit to --

22 THE WITNESS: Your voice is low.

23 MR. BALKEN: I will start over.

24 This is -- this is exhibit --
25 this was Exhibit 3 to the deposition

1 C. WILLIAMS CONFIDENTIAL
2 of Max Rinaldi.

3 It was produced in discovery by
4 the defendants as Bates number 185.
5 It was also an exhibit to their
6 opposition -- defendants' opposition
7 to motion for preliminary injunction
8 in this case.

9 It's an e-mail from someone
10 named Max Rinaldi, a witness in that
11 deposition and --

12 (Speaking simultaneously.)

13 THE WITNESS: I'm sorry. I
14 cannot hear you. It is very low. I
15 turned my mic up. I can hardly hear
16 you.

17 MR. BALKEN: Mr. Bernstein, are
18 you having the same issue?

19 MR. BERNSTEIN: No. I hear you
20 fine.

21 MR. BALKEN: It is Ms. Williams'
22 computer or phone.

23 (Speaking simultaneously.)

24 MR. BALKEN: It's an e-mail from
25 Mr. Rinaldi to Harry Dorvilier.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Do you see that?

3 A. Yes.

4 Q. Have you ever seen this document
5 or e-mail before?

6 A. No, I don't recall. No.

7 Q. And on it -- it contains three
8 addresses. Do you see at the bottom there
9 are three possible addresses in New York.
10 Do you see that?

11 A. Yes.

12 Q. It lists three addresses.
13 Do you see that?

14 A. Yes, I do.

15 Q. Do you recognize any of them?

16 A. Yes, I do for the most part. I
17 recognize the one in Dutchess County. I
18 recognize the Linden Boulevard.

19 The one in Jamaica Avenue,
20 Jamaica, I am not exactly sure. It's a
21 possibility. Like I said, I was a
22 travelling nurse, but I can't recall
23 exactly.

24 Q. To clarify, you recall residing
25 at 4 Sage Road. You're not sure if you

1 C. WILLIAMS CONFIDENTIAL

2 resided at 17405 125th Avenue in Jamaica,
3 New York and you do recall residing at 212
4 Linden Boulevard, Saint Albans, New York?

5 A. I never -- I never resided
6 there.

7 Q. But you recognize it?

8 A. I recognize.

9 Q. By there, I mean Linden
10 Boulevard, Saint Albans, New York?

11 A. Correct.

12 Q. It just looks familiar. You
13 have no idea why it looks familiar though?

14 A. Of course I do.

15 Q. Why does it look familiar?

16 A. Because my friend has a
17 restaurant there, Golden Crust.

18 Q. Have you ever resided at your
19 friend's restaurant?

20 A. No.

21 Q. Is there like an apartment above
22 the restaurant?

23 A. Not that I recall. I don't
24 remember. I don't know. I don't remember
25 I have not been there in many years. I

1 C. WILLIAMS CONFIDENTIAL

2 don't remember.

3 Q. Now, if you can just open
4 Exhibit E.

5 A. Okay.

6 Q. This was produced as, among
7 other things, Plaintiff's document
8 production. Bates number 127 through 130.

9 It was also Exhibit 4 to Max
10 Rinaldi's deposition. It was an
11 accompanying attachment to that e-mail we
12 just looked at.

13 A. Okay.

14 Q. Have you ever seen this before?

15 A. Yes, I have.

16 Q. When? Without disclosing the
17 privilege between you and your attorney?

18 A. Few days ago.

19 Q. Have you seen it before then?

20 A. No, I don't recall.

21 Q. Is it safe to say you looked at
22 it in preparation for this deposition a
23 few days ago?

24 A. Yes.

25 Q. If you can direct your attention

1 C. WILLIAMS CONFIDENTIAL

2 to the third -- I'm sorry, the second page
3 to that. Defendant's 128.

4 There it says address history.

5 Do you see that?

6 A. Yes, I do.

7 Q. Under that it goes on for the
8 rest of that page and the next two pages
9 listing addresses.

10 Do you see that?

11 A. Yeah.

12 Q. I would like you to look it over
13 and tell me if there are any of these that
14 you do not recognize?

15 A. I don't know. Anyway, I don't
16 know. Yeah, there are a lot of them I
17 don't recognize, yeah.

18 Q. Have you gone through the entire
19 list?

20 A. Yeah, just about. Yeah, I have.

21 Q. How many of them don't you
22 recognize?

23 A. A lot of them.

24 Q. Let's go through them all.

25 You recognize the first one 230

1 C. WILLIAMS CONFIDENTIAL

2 River Crest Lane, correct?

3 A. Yes, I do.

4 Q. You recognize the second one, 4
5 Sage Road, correct?

6 A. What pare are you on?

7 Q. I am on page two of four.
8 Defendant's 128.

9 A. Okay. Addresses. Okay.

10 Q. So you recognize 4 Sage Road,
11 correct?

12 A. Yes, I do.

13 Q. To clarify, you reside -- you
14 currently reside at 230 River Crest and
15 you have resided at 4 Sage Road from the
16 past, correct?

17 A. Yes.

18 Q. Do you recognize the next
19 address, which is 17405 125th Avenue,
20 Jamaica, New York?

21 A. Not really. No.

22 Q. In other words, you might
23 recognize it but you're not sure?

24 A. That's not me.

25 Q. But do you recognize the

1 C. WILLIAMS CONFIDENTIAL

2 address?

3 A. No, I don't.

4 Q. Okay. And you never resided at
5 that address I would assume --

6 A. I don't recall.

7 Q. Again, I am just clarifying your
8 testimony. Is it that you don't recall
9 seeing that address or residing at that
10 address, or are you positive that you have
11 never resided at that address and have
12 never seen that address?

13 A. I don't recall.

14 Q. Thank you.

15 The next one, 20012 Linden
16 Boulevard, Saint Albans, New York.

17 Do you recognize that address?

18 A. I do.

19 Q. Is that the address that you
20 spoke about before where your friend owned
21 a restaurant?

22 A. Yes.

23 Q. The next one, that appears to be
24 the same address of yours in Georgia,
25 River Crest Lane.

1 C. WILLIAMS CONFIDENTIAL

2 A. Okay.

3 Q. The one after that 785 Baldwin
4 Street, Baldwin, New York.

5 Do you recognize that address?

6 A. Yes, I do.

7 Q. Is that one of the addresses
8 that we spoke about from your
9 interrogatory answer?

10 A. Probably. I think you did.

11 Q. But just to confirm, you have
12 resided there?

13 A. Yes, I did. Yes.

14 Q. Did you reside there from 2007
15 through 2010?

16 A. I don't remember how long I
17 resided there for.

18 Q. The next one, Fenton Avenue,
19 Bronx, New York.

20 That's the same address you had
21 listed in your interrogatory answer,
22 correct?

23 A. Yes, it is.

24 Q. And I mean that's the same Bronx
25 address?

1 C. WILLIAMS CONFIDENTIAL

2 A. It is the same Bronx address.

3 Q. And you were -- okay. The next
4 one is Murdock Avenue. That's the address
5 that we have been discussing you resided
6 at with and not with Mr. Mathias, correct?

7 A. Yes.

8 Q. After that is a PO Box address
9 in Orlando, Florida in Orange County.

10 Do you recognize that?

11 A. I don't recognize it, but it's
12 possible.

13 Q. What is possible?

14 A. It's possible that I could have
15 used it. I don't recall those. I don't
16 recall.

17 No, not that one. No, I don't.

18 Q. How many times have you used
19 post office addresses? I'm sorry, post
20 office box addresses for yourself?

21 A. Probably about two times.

22 Q. What were those addresses?

23 A. I don't remember. I know one
24 was -- they both were in Georgia.

25 Q. What was the reason you were

1 C. WILLIAMS CONFIDENTIAL

2 using those two post office box addresses?

3 A. The one that was my girlfriend's
4 PO box. I needed mail to go there when I
5 just came to Georgia and in the process of
6 buying a house. That was the reason why I
7 needed to use it.

8 Q. What about the other one?

9 A. The other one I used -- it was
10 not for personal use. It was for
11 business.

12 Q. I want to circle back. You said
13 the first one you were residing at your
14 friend's house?

15 A. No, I did not say that. I said
16 that the first one I just came to Georgia.
17 I was in the process of buying a house and
18 I needed an address. She gave me her PO
19 box address to use.

20 Q. So you needed an address to use
21 for purchase of your house in Georgia?

22 A. I didn't say that.

23 Q. You did not use that post office
24 box address for application to purchase --

25 (Speaking simultaneously.)

1 C. WILLIAMS CONFIDENTIAL

2 A. I did not, no.

3 Q. Please --

4 (Speaking simultaneously.)

5 A. I said I needed an address for
6 mail to go. I said I just come to Georgia
7 and I was -- forget about buying the
8 house. I needed an address for mail to
9 come to.

10 Q. Where were you residing at that
11 time?

12 A. At a hotel.

13 Q. Where?

14 A. In Conyers, Georgia. I don't
15 remember the address.

16 Q. How long were you residing at
17 that hotel?

18 A. I don't know.

19 Q. Was anyone residing with you?

20 A. My children were with me.

21 Q. Other than your children, was
22 anyone else residing with you at that
23 time?

24 A. No, there was no one else.

25 Q. Moving onto next one listed,

1 C. WILLIAMS CONFIDENTIAL

2 9274 Shawnbrook Lane, Jacksonville,
3 Florida.

4 Do you recognize that address?

5 A. Yes, I do.

6 Q. Have you resided there?

7 A. No, I do not.

8 Q. Why did you recognize the
9 address?

10 A. Because my niece owned a house
11 that was there.

12 Q. Did you ever reside with your
13 niece in that house?

14 A. No, I did not.

15 Q. But you visited her?

16 A. Yes, I did.

17 Q. Approximately, what was the
18 longest duration of any of your visits to
19 your niece in that house?

20 A. One day.

21 Q. The next one is another post
22 office box address. PO Box 465, Regan,
23 Georgia.

24 Do you recognize that?

25 A. That's the one I was referring

1 C. WILLIAMS CONFIDENTIAL

2 to prior when you were talking about PO
3 box.

4 Q. Understood. While you were
5 residing at that hotel in Georgia?

6 A. Correct.

7 Q. The next one is 5465 Curry Ford
8 Road, Apartment D4, Orlando, Florida.

9 Do you recognize that apartment?

10 A. Yes.

11 Q. Did you reside there?

12 A. Yes, I did.

13 Q. And that's the address you
14 listed as, you know, in your interrogatory
15 answer where you said you couldn't recall
16 the exact address, correct?

17 A. Yes, that's correct.

18 Q. It's -- you were -- it says
19 there you were there from 1993 to 2006, as
20 opposed to what you said in your
21 interrogatory response of 2000 through
22 2003.

23 Does that --

24 A. I'm sorry.

25 Q. So, I am just wondering, did you

1 C. WILLIAMS CONFIDENTIAL

2 -- like which one is correct?

3 A. I was not residing there in
4 1993.

5 Q. Were you residing there past
6 2003?

7 A. I don't remember. I went there.
8 I went to Florida in 2000. That was the
9 first place I lived. That was where I
10 lived rather.

11 I -- I -- 2000. I don't
12 remember how long I lived there for --

13 Q. Okay.

14 A. It probably wasn't long, but I
15 don't remember how long.

16 Q. Next is Ironside Drive.

17 A. Okay.

18 Q. And it's in Jacksonville,
19 Florida.

20 Do you recognize that address?

21 A. Yes, my niece's property.

22 Q. Your niece's property. Are
23 you -- you're saying this is one of the
24 properties we referred to before?

25 A. No.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Okay. She -- did you reside
3 there with your niece ever?

4 A. No, I did not.

5 Q. Did you ever visit there?

6 A. Yes, I have.

7 Q. What was the longest duration of
8 your longest visit?

9 A. I only stayed with my niece for
10 a day or two. That's it.

11 Q. Below that appears to be the
12 same Murdock Avenue address which we
13 discussed that you having lived part of
14 the time with Mr. Mathias, correct?

15 A. Yes.

16 Q. Below that you have 11433 141st
17 Street, Jamaica, New York.

18 Do you recognize that address?

19 A. No, I don't. I can't -- I
20 don't. Again, I don't --

21 (Speaking simultaneously.)

22 Q. Do you have something you want
23 to add to that?

24 A. No, I don't have anything to
25 add.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Then you have 4501 Harbor Lake
3 Drive, Goose Creek in Southern California.

4 Do you recognize that address?

5 A. Nope, not at all.

6 Q. Then you have an address 645
7 Willow Wood Avenue, Altima Springs,
8 Florida, Seminole County.

9 Do you recognize that address?

10 A. It sounds familiar, but I am not
11 sure.

12 Q. Do you recognize the next
13 address of 2059 Dixie Drive, Orlando,
14 Florida, Orange County?

15 A. No, I don't.

16 Q. The next address is Joanne Drive
17 -- 3509 Joanne Drive, Baltimore County in
18 Massachusetts? Maryland, sorry?

19 A. No, I don't. I never lived
20 there.

21 Q. But do you recognize it?

22 A. No, I don't.

23 Q. The next address is 2591 West
24 Washington Street, Orlando, Florida.

25 Do you recognize this address?

1 C. WILLIAMS CONFIDENTIAL

2 A. No, I don't.

3 Q. The next address is 11947 166th
4 Street, PH, Jamaica, New York.

5 Do you recognize this address?

6 A. Again, I don't recall.

7 Q. When you say "again," are you
8 saying you think this was listed before?

9 A. No, I don't know. I don't
10 remember. I don't recall that address.

11 Q. Thank you.

12 The next one is 754 Lafayette
13 Avenue.

14 Do you recall that address?

15 A. Yes, I do recall the address.

16 Q. Did you reside there?

17 A. No, I didn't reside there.

18 Q. What do you recall about the
19 address?

20 A. I owned a property at one time.

21 Q. Was it between 1998 -- was it in
22 1998?

23 A. Why?

24 Q. I think I am the one who gets to
25 ask the questions here?

1 C. WILLIAMS CONFIDENTIAL

2 A. I -- no --

3 MR. BERNSTEIN: I think she
4 didn't understand your question.

5 MR. BALKEN: She asked why?

6 THE WITNESS: Yes, I was asking
7 me why.

8 MR. BALKEN: I thought you were
9 asking me why I am asking the
10 question.

11 THE WITNESS: No, no.

12 Q. Yes. I am asking you if you
13 resided there in 1998?

14 A. I never lived --

15 (Speaking simultaneously.)

16 MR. BALKEN: Strike that
17 question. That's why I interrupted.

18 Q. Did you purchase that property
19 in 1998?

20 A. I purchased a property. What
21 year, I don't remember the exact year, but
22 I did purchase the property.

23 Q. Why did you purchase the
24 property?

25 A. I was into real estate.

1 C. WILLIAMS CONFIDENTIAL

2 Q. As an investment?

3 A. Yes.

4 Q. Did there come a point in time
5 where you no longer owned that property?

6 A. Yes.

7 Q. So you sold it?

8 A. I think so, yes.

9 Q. Do you recall when that
10 happened?

11 A. No.

12 Q. Why did you sell it?

13 A. Because it was time to get rid
14 of it.

15 Q. Why was it time to get rid of
16 it?

17 A. Because I wanted to get rid of
18 it.

19 Q. Why did you want to get rid of
20 it?

21 A. Because I wanted to get rid of
22 it.

23 MR. BALKEN: Mr. Bernstein, can
24 you instruct your client to answer the
25 question.

1 C. WILLIAMS CONFIDENTIAL

2 MR. BERNSTEIN: Ms. Williams, do
3 you recall the reason that it was time
4 to get rid of the property?

5 If you can't recall --

6 THE WITNESS: I can't recall.

7 Q. Do you recognize the address
8 16003 132nd Avenue, Jamaica, New York?

9 A. No, I don't.

10 Q. For the record, that was the
11 next property on the list. That is also
12 the last property on that list.

13 If you can move up to the first
14 page it lists, like, there is a header to
15 cities.

16 Do you see that?

17 A. You said the first page?

18 Q. Yes.

19 A. Okay. The first page says for
20 attorneys/law firm purposes only.

21 Q. Yes, and below that there is a
22 bunch of headers. You see like it says
23 possible relatives --

24 A. Okay. I see it now.

25 Q. One of the headers is cities.

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2 Do you see that?

3 A. Yes.

4 Q. I would like you to yourself to
5 look at all of those cities and tell me if
6 you remember buying property or residing
7 within any property within those cities?

8 A. You know, I lived in Conyers,
9 Georgia. I resided at my brother's house
10 in Baldwin, New York. I lived in the
11 Bronx.

12 I had a property in Brooklyn,
13 New York. I resided temporarily on and
14 off in Baldwin, New York. I owned a house
15 in Queens Village, New York. That's it.

16 Q. I believe you mentioned Saint
17 Albans, New York previously, correct?

18 A. I did not mention Saint Albans,
19 New York previously.

20 Q. I just want to clarify going
21 through them.

22 Altima Springs, Florida, do you
23 recall residing or purchasing there.

24 A. No, I don't.

25 Q. Jacksonville, Florida, you do

1 C. WILLIAMS CONFIDENTIAL

2 recall residing there, correct?

3 A. I told you my niece owned a
4 property there. I visited her.

5 Q. My mistake. Orlando, Florida,
6 do you recall residing there?

7 A. Yes, I --

8 Q. Let's skip Covington.

9 Do you recall residing at
10 Windsor Mill mill?

11 A. I don't what that is.

12 Q. You don't, like, recall that
13 area at all?

14 A. I don't.

15 Q. You said -- you said Baldwin.
16 You said the Bronx. You said Brooklyn.
17 You spoke about Jamaica, New York.

18 Do you recall Queens Village?

19 A. That's Murdock Avenue.

20 Q. Right. And Goose Creek?

21 A. I don't know Goose Creek. I
22 don't know where that is.

23 Q. Below that we have possible
24 other phones.

25 Do you see that header?

1 C. WILLIAMS CONFIDENTIAL

2 A. Yes, I see it.

3 Q. I'd like you to go through it
4 and tell me how many of them you
5 recognize.

6 A. I only recognize the first two.

7 Q. And were they your numbers?

8 A. One still is. The other one
9 was.

10 Q. Which one still is?

11 A. The first one.

12 Q. And the second one was at one --

13 A. My home phone. It was my home
14 phone.

15 Q. And you don't recognize any of
16 those other numbers?

17 A. No, I don't. No, I do not
18 recognize any of those numbers.

19 Q. If we can go to -- if you can
20 direct your attention to the left of that
21 page.

22 It has a list of the beginning
23 of Social Security numbers. That goes all
24 the way to the next page to the top of it.

25 I would like you to tell me

1 C. WILLIAMS CONFIDENTIAL

2 which of those Social Security numbers, or
3 the beginnings of Social Security numbers
4 you recognize in that.

5 A. 12582.

6 Q. What about 13180?

7 A. I've only had one Social
8 Security number, 12582.

9 Q. Do you recognize 13180?

10 A. I only recognize 12582.

11 Q. You see on the next page there
12 is actually 125829004.

13 Do you recognize that one?

14 A. No, I don't.

15 Q. Do you recognize the name on the
16 bottom of the first page. Right under
17 12582. It says MY Qiu.

18 Do you recognize --

19 A. No.

20 Q. If you're -- staying on that
21 first page if you look at another one of
22 those headers it says indicators. Below
23 that it says the word bankruptcies.

24 Do you see that?

25 A. Okay. Yes. I see it now.

1 C. WILLIAMS CONFIDENTIAL

2 Q. It say "five found latest in
3 2013."

4 Do you see that?

5 A. Yes, I see it.

6 Q. Does that refresh your memory as
7 to how many bankruptcies you have filed?

8 A. No, it doesn't. I never filed
9 five bankruptcies.

10 Q. On the top it has a list of
11 three relatives. We don't need to say
12 their names, but do you recognize any of
13 those people?

14 A. Steve Gayle. That's my brother.

15 Q. What about the top and bottom
16 names?

17 A. I don't -- (unintelligible). I
18 know.

19 Q. You know him. Okay.
20 What is your relationship with
21 him?

22 A. Him who?

23 Q. Tomosina Williams?

24 A. I don't have a relationship with
25 Tomosina. I knew her at one time.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Her. I apologize. I thought
3 you said him.

4 How do you know her?

5 A. She was my uncle's girlfriend.

6 Q. Do you recognize the top name?

7 A. No, I don't.

8 Q. Just circling back to Ms.
9 Williams, Tomosina Williams, was she the
10 girlfriend of the uncle whose house you
11 lived in?

12 A. She -- what house are you
13 referring to?

14 Q. Earlier --

15 A. The one in Laurelton, yes.

16 MR. BALKEN: Let's take five
17 minutes.

18 (A recess was taken.)

19 MR. BALKEN: This is Exhibit F.
20 It was produced in Plaintiff's
21 Discovery, rather I think it might be
22 Defendants Bates number 181.

23 It's also an exhibit to
24 Defendant's -- motion preliminary
25 injunction.

1 C. WILLIAMS CONFIDENTIAL

2 Q. My question for you, Ms.

3 Williams -- Mrs. Williams, do you
4 recognize this document?

5 A. Yes, I do.

6 Q. What is it?

7 A. What do you call it? I think
8 it's called I9. I am not sure whatever it
9 is, but it's -- it is a form that you fill
10 out when you get employment.

11 Q. Did you fill this out?

12 A. Yes, I did.

13 Q. Do you see the highlighted box
14 there?

15 A. Yes, I --

16 Q. I assume the highlight was not
17 there when you filled this out; is that
18 right?

19 A. That's correct.

20 Q. It says under -- it says under
21 -- I am going to read it for the record.

22 "I attached under penalty of
23 perjury that I am, check on of the
24 following." There are three boxes.

25 The first box says "a citizen

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2 of -- I'm sorry.

3 The first box says "a citizen or
4 national of the United States."

5 The second box says "a lawful
6 permanent resident alien number." I think
7 there's an A after that or a -- it's hard
8 to see what that is.

9 MR. BERNSTEIN: It's an A.

10 Q. And below that there's a box,
11 another box, third box, and it says "alien
12 authorized to work until," and there is a
13 blank.

14 Below it requests an alien
15 number or admission number and there's a
16 blank.

17 My question to you, Mrs.
18 Williams, when you filled out this
19 application you did not check any of those
20 boxes, correct?

21 A. Correct.

22 Q. Earlier in this deposition you
23 testified about not filling out certain
24 boxes in your application to work for
25 Harry's Nurses Registry.

1 C. WILLIAMS CONFIDENTIAL

2 Do you remember that?

3 A. Yes.

4 Q. Were you referring to those
5 boxes in this document?

6 A. Yes, I was.

7 Q. Why did you not fill them out?

8 A. Because neither of them applied
9 to me.

10 Q. Did you clarify that in any way
11 in your application?

12 A. No clarification was sought of
13 me.

14 Q. Did you have an alien number or
15 admission number at that time?

16 A. I was just saying --

17 (Speaking simultaneously.

18 MR. BALKEN: Let's move on to
19 the last exhibit. I am going to
20 e-mail it in a second.

21 This is Exhibit G, and it is --
22 it was produced by Plaintiff -- I'm
23 sorry by Plaintiff yesterday.

24 No, it was not yesterday.

25 MR. BERNSTEIN: A few months

1 C. WILLIAMS CONFIDENTIAL

2 ago.

3 MR. BALKEN: It was -- it is
4 Bates number 94 through 96. It
5 appears to be two e-mails with some
6 redacted text about each e-mail.

7 Q. Ms. Williams -- Mrs. Williams,
8 do you recognize this document?

9 A. Yes, I do.

10 Q. What is it?

11 A. It's a TSA document. TSA
12 document.

13 Q. TSA document?

14 A. Yes, when I applied for TSA
15 number.

16 Q. You applied for a TSA number?

17 A. Yes, I applied for TSA number.

18 Q. First, is that a redaction on
19 the top of each page?

20 MR. BERNSTEIN: Counsel, I did
21 the redaction. I can tell you what it
22 is. She's not going to know what it
23 is.

24 MR. BALKEN: Well, I would
25 assume she has seen it before.

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2 MR. BERNSTEIN: Mrs. Williams
3 e-mailed -- I should say forwarded
4 this document to me. Rather she
5 didn't save it as a PDF and forwarded
6 it me. Rather she forwarded me the
7 e-mail.

8 What has been redacted from
9 Claudia Williams to Jonathan
10 Bernstein, subject.

11 And then in the bar it is -- you
12 probably have something like this on
13 your firm's e-mail system. Caution
14 this originated from outside the firm.
15 That's all it is.

16 There may be something like,
17 here is the e-mail I said I would
18 forward you or something that.

19 MR. BALKEN: Okay. Thank you
20 for your clarification.

21 Q. Mrs. Williams, if you go to the
22 second page, it mentions -- it says --
23 like the first paragraph I am going to
24 read.

25 "Claudia Williams, the

1 C. WILLIAMS CONFIDENTIAL

2 transportation security administration,
3 TSA, reviewed your submission TSA
4 pre-application program and determined you
5 are eligible for the program."

6 My question to you, Mrs.
7 Williams, is this the same application
8 that you spoke about when I first asked
9 you to look at this document?

10 A. I don't understand your
11 question.

12 Q. Is this application for TSA
13 number you mentioned before?

14 A. Right. When I looked at it,
15 yes.

16 Q. What documents were in that
17 application?

18 A. What documents? You go online
19 and apply for TSA number and then you have
20 to go to location and present your
21 documents. Like your green card, your
22 Social Security number and your driver's
23 license.

24 Q. Those three documents; you
25 presented your green card, Social Security

1 C. WILLIAMS CONFIDENTIAL

2 card and driver's license?

3 A. Yes, sir.

4 Q. You just like -- you didn't take
5 a picture you just gave the hard versions?

6 A. What they do is like biometrics.
7 That take a copy and they take pictures of
8 you like biometrics and then they do FBI
9 background check.

10 MR. BALKEN: Okay. That's all
11 my questions.

12 MR. BERNSTEIN: I have a few
13 clarifying questions.

14 EXAMINATION BY

15 MR. BERNSTEIN:

16 Q. Mrs. Williams, earlier today you
17 testified that you applied for an NPI
18 number.

19 Do you recall that?

20 A. Yes, sir.

21 Q. Can you remind me what NPI
22 stands for, if you know?

23 A. National Provider Identification
24 number.

25 Q. Do you recall the year that you

1 C. WILLIAMS CONFIDENTIAL

2 applied for an NPI number?

3 A. No, I don't remember the exact
4 year.

5 Q. Would it have been before 2000
6 or after 2000, if you know?

7 A. No, it would be after 2000
8 because I became a LPN in 2006. So it was
9 after 2006.

10 Q. Earlier you testified that you
11 have deleted one or more e-mails from
12 Experian saying that your personal
13 information was on the dark web.

14 Do you remember that?

15 A. Yes, sir.

16 Q. Did these e-mails come to your
17 G-mail address or to another address?

18 A. They come to G-mail.

19 Q. Have you deleted any of those
20 e-mails in the last three months?

21 A. I mostly --

22 MR. BALKEN: Objection. She
23 answered that.

24 MR. BERNSTEIN: You can answer.

25 A. I don't recall.

1 C. WILLIAMS CONFIDENTIAL

2 Q. You testified earlier that you
3 did some locum work; do you recall that?

4 A. Yes, sir.

5 Q. Can you explain to us what locum
6 work is?

7 A. It's travel assignments. It's
8 mostly temporary. You sign up with an
9 agency, medical agency, nursing agency.
10 They will send you to different places to
11 work. Different states -- different
12 states to work and you work with different
13 companies for a period of time and then
14 that's -- that's what that is.

15 Q. This is in the medical field?

16 A. In the medical field, yes.

17 Q. Do you know if locum is short
18 for a longer phrase?

19 A. I'm not sure. I am not sure.

20 Q. Could it be locum tenens?

21 A. Yes, that is it. Yes.

22 Q. Have you ever applied for
23 political asylum in the United States?

24 A. Yes, I did.

25 Q. When was that, if you remember?

1 C. WILLIAMS CONFIDENTIAL

2 A. I -- I think probably 1994.
3 Either 1993 or 1994. Somewhere around
4 there.

5 MR. BALKEN: I am going to call
6 for production of that application.

7 Q. Mrs. Williams, did you keep a
8 copy of your application for political
9 asylum?

10 A. I don't have a copy. I don't
11 have the paperwork. Like I said, it has
12 been a long time.

13 Q. When you made that application
14 for political asylum were you represented
15 by counsel?

16 A. No, I did that on my own.

17 Q. Did you go to a government
18 office to file your asylum application?

19 A. Yes, I did.

20 Q. Do you remember what part of the
21 government it was?

22 A. Honestly, I don't. I don't
23 recall. It was in Queens, New York, but I
24 don't remember exactly where.

25 Q. Was it in a government building?

1 C. WILLIAMS CONFIDENTIAL

2 A. I believe so.

3 Q. Was it in a federal building?

4 A. That I don't know for sure.

5 Probably not. I don't remember.

6 Q. Do you remember what street it
7 was on?

8 A. I believe -- I am not accurate,
9 but I believe on Jamaica Avenue in Queens,
10 New York I believe.

11 Q. When you applied for political
12 asylum did the official who took your
13 application return anything to you, a
14 receipt or anything like that?

15 A. I don't recall. Probably, but I
16 really don't recall.

17 MR. BALKEN: I call for
18 production of that receipt.

19 Q. Did you -- did you then apply
20 for a Social Security number?

21 A. At the same time I put in
22 application for political asylum that was
23 the same time application for the Social
24 Security number was put in place. So I
25 did not go to a separate office for that.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Did you ever receive a Social
3 Security card in the mail after?

4 A. Yes, I did. After that work
5 permit came then Social Security card
6 came.

7 Q. So you received two separate
8 mailings; one with a work permit and one
9 with a Social Security card?

10 A. That is correct.

11 Q. This was in 1994 you said? It
12 might have --

13 A. Yes, I think -- my Social
14 Security card I think one time -- my
15 Social Security card was -- actually my
16 number was generated in 1994.

17 MR. BALKEN: Before your next
18 question, I am going to call for
19 production of that work authorization
20 -- is that what you called it? Work
21 form?

22 MR. BERNSTEIN: Yes, work
23 authorization.

24 MR. BALKEN: I am going to call
25 for production of that.

1 C. WILLIAMS CONFIDENTIAL

2 Q. Do you still have a copy of the
3 work authorization card that was issued
4 with your asylum application?

5 A. No, I don't.

6 Q. Do you recall what happened to
7 it?

8 A. No, I don't. Probably got in
9 the garbage. I mean once it expired it's
10 no good.

11 Q. The Social Security card that
12 was issued to you didn't have an
13 expiration date on the card, did it?

14 A. No, it did not. It does not
15 have expiration date. It did not have an
16 expiration date.

17 Q. Did you ever have a court
18 hearing with regard to your application
19 for political asylum?

20 A. I don't think so. I don't think
21 so.

22 Q. Do you know whether your
23 application for political asylum was
24 granted?

25 A. It was not granted.

1 C. WILLIAMS CONFIDENTIAL

2 Q. It was denied?

3 A. It was denied. I believe so.

4 Q. Do you know why that application
5 for political asylum was denied?

6 A. It probably was about the same
7 time -- it was after I received
8 authorization and the work -- the Social
9 Security card, but I don't remember the
10 exact year. I don't remember if it was
11 '94 or '95.

12 MR. BALKEN: I am going to call
13 for production of any documents that
14 you may have representing the decision
15 to deny you political asylum.

16 Q. Do you have any of the documents
17 that were issued to you with regard to the
18 denial of the application for political
19 asylum?

20 A. No, sir. I don't have any of
21 those documents.

22 Q. Do you know what happened to
23 them?

24 A. No. They got lost. I don't.

25 Q. Other than your application for

1 C. WILLIAMS CONFIDENTIAL

2 visitors visa, your application for
3 political asylum, and your application for
4 permanent --

5 MR. BERNSTEIN: Withdrawn.

6 Q. At the time your application for
7 political asylum was denied, as far as you
8 know, your work authorization, your
9 authorization to work in the United States
10 terminated, correct?

11 A. The work authorization was for
12 six months. So I am not -- I really do
13 not remember the specific details around
14 that.

15 You know, if they stopped it
16 then. I really don't remember.

17 Q. Is it fair to say that at some
18 point, no later than 1995, you were not
19 authorized to work in the United States
20 and did not regain work authorization
21 until at least 2012?

22 A. Yes --

23 MR. BALKEN: Objection.

24 A. 2013, 2014. Somewhere around
25 there.

1 C. WILLIAMS CONFIDENTIAL

2 Q. The Social Security number that
3 you use today, is that the same Social
4 Security number that was issued to you in
5 1994?

6 A. It is the same.

7 MR. BERNSTEIN: I have nothing
8 further.

9 MR. BALKEN: I would like to ask
10 another question to Mrs. Williams.

11 CONTINUED-EXAMINATION BY

12 MR. BALKEN:

13 Q. What was the basis for your
14 request for political asylum?

15 A. I was trying to get permanent
16 residency.

17 Q. What was the basis you were
18 giving for why you should be granted that
19 for in your application for political
20 asylum?

21 A. I don't remember. I really
22 don't remember.

23 MR. BALKEN: I have no further
24 questions.

25 MR. BERNSTEIN: I have nothing

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C. WILLIAMS CONFIDENTIAL
further.

Before we go off the record, I forgot to mention that we would like to read and sign the transcript.

MR. BALKEN: Of course.

MR. BERNSTEIN: I have nothing further.

(TIME NOTED: 2:18 p.m.)

CLAUDIA GAYLE

Subscribed and sworn to before me

this __ day of _____, 2024.

Notary public

I N D E X

WITNESS	EXAMINATION BY	PAGE
CLAUDIA WILLIAMS	STEVEN BALKEN	4
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	STEVEN BALKEN	157

E X H I B I T S

DEFENDANT'S	DESCRIPTION
Exhibit A	Passport
Exhibit B	Driver's License
Exhibit C	Plaintiff's Answer
Exhibit D	E-mail
Exhibit E	Document
Exhibit F	I9 Document
Exhibit G	TSA Document

INSERTIONS

Page	Description
39	List of Places Worked

(Continued on the next page.)

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REQUESTS

Description

E-mails

Deposition Transcripts

NPI Application

Resume

Social Media Documents

Visa Application

Work Authorization Application

Mark Fish' Phone Number

Marriage Certificate

Political Asylum Application

Political Asylum Application Receipt

Denial of Political Asylum Application

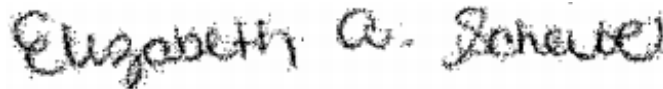
CERTIFICATION

I, ELIZABETH SCHEIBE, a Notary Public for
and within the State of New York, do
hereby certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not related
to any of the parties to this action 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 this 11th day of June, 2024.



ELIZABETH SCHEIBE

* * *

CASE NAME: Gayle, Claudia v. Harry's Nurses Registry, Inc And
Dorvilier, Harry

WITNESSES' NAME: Claudia Gayle

[illegible]

THIS _____ DAY OF _____, 20__.

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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