

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

JAMES P. CHASSE, JR.; JAMES P.)  
CHASSE; LINDA GERBER; and MARK)  
CHASSE, individually and in )  
capacity as Personal )  
Representative of the ESTATE )  
OF JAMES P. CHASSE, JR., )

Plaintiffs, )

vs. )

CHRISTOPHER HUMPHREYS; KYLE )  
NICE; CITY OF PORTLAND; CITY )  
OF PORTLAND JOHN DOE )  
FIREFIGHTERS/PARAMEDICS; )  
PORTLAND POLICE BUREAU and )  
OTHER PORTLAND JOHN and JANE )  
DOE OFFICIALS; BRET BURTON; )  
MULTNOMAH COUNTY; MULTNOMAH )  
COUNTY JOHN and JANE DOE )  
DEPUTY SHERIFFS and MEDICAL )  
PERSONNEL; MULTNOMAH COUNTY )  
JOHN and JANE DOE SHERIFF'S )  
OFFICE and OTHER OFFICIALS; )  
TRI-COUNTY METROPOLITAN )  
TRANSPORTATION DISTRICT OF )  
OREGON; and AMERICAN MEDICAL )  
RESPONSE NORTHWEST, INC., )

Defendants. )

ORIGINAL

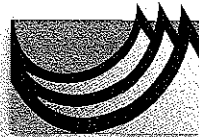
No. CV-07-0189-HU

DEPOSITION OF  
GARY SZALAY  
Taken in behalf of Plaintiffs

\* \* \*

January 16, 2008  
1211 S.W. Fifth Avenue  
Portland, Oregon

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Court Reporter



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18

19

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1 PORTLAND, OREGON; WEDNESDAY, JANUARY 16, 2008

2 4:51 p.m.

3 \* \* \*

4 (Deposition Exhibit No. 87 was marked for  
5 identification.)

6 GARY SZALAY

7 called as a witness in behalf of the Plaintiffs,  
8 having first been sworn by the Reporter,  
9 testifies as follows:

10 EXAMINATION

11 BY MR. SCHNEIGER:

12 Q. Would you state and spell your name, please?

13 A. Gary Alan Szalay, G-A-R-Y, A-L-A-N, S as in  
14 Sam, Z as in zebra, A-L-A-Y.

15 Q. You're like me. You never have your last  
16 name misspelled, do you?

17 A. No.

18 Q. Mr. Szalay, my name is Tom Schneiger. I'm  
19 one of the attorneys, along with Tom Steenson, who is  
20 representing Mr. Chasse, and I just want to ask you  
21 some questions about the events of the day that you  
22 were called to the scene of 13th and Everett --

23 A. Uh-huh.

24 Q. -- when Mr. Chasse was injured. And you  
25 understand you're sworn to tell the truth?

1 A. Yes.

2 Q. You're under oath?

3 A. (Witness nodding head.)

4 Q. That your testimony today should be no  
5 different than it would be if we were in front of a  
6 judge and jury in the trial of this case?

7 A. I do.

8 Q. Have you ever testified before?

9 A. I have not.

10 Q. Tell me about your training as a firefighter  
11 and EMT, where it happened, when.

12 A. When I turned 18, I joined the volunteers out  
13 in Corbett. It's an all-volunteer organization. I  
14 was trained to DPPST standards for firefighter there.

15 Q. What are those standards again?

16 A. Department of Public -- it's firefighter  
17 standards.

18 Q. Okay.

19 A. And I was also trained there to EMT-First  
20 Responder, which is the level below where I'm at now  
21 as a Basic.

22 I attended college at Portland Community  
23 College.

24 Q. Which campus?

25 A. They called it the fire science. It was in

1 Gresham at 192nd and San Rafael. It's Gresham Fire  
2 Station 72. I attended there for two years.

3 I then -- I was hired by Portland and --

4 Q. Portland Fire Department?

5 A. Portland Fire Department, and trained through  
6 Portland.

7 Q. Okay. When did you go to PCC?

8 A. '98 through 2000.

9 Q. Now, that's a little longer than normal to  
10 take the EMT course at Portland Community College.  
11 Were you working part-time or --

12 A. Yes.

13 Q. What were you doing at the time?

14 A. I framed houses for a local construction  
15 company in Corbett, and I worked at a snowboard shop.

16 Q. A snowboard?

17 A. Uh-huh.

18 Q. So you hired on with the Portland Fire  
19 Department in which year?

20 A. 2002.

21 Q. And you've been employed there ever since?

22 A. Correct.

23 Q. As a firefighter and EMT-Basic?

24 A. Correct.

25 Q. Tell me what you remember about the call this

1 day.

2 A. I remember arriving, where we parked.

3 Q. Just tell me about you arriving and where you  
4 parked and stuff like that.

5 A. Oh, we arrived on -- let's see. That runs  
6 east, so that is Everett Street between 13th and 14th  
7 on the right-hand side of the road because it's a  
8 one-way. There's two lanes and you have to watch when  
9 you get out from my side, so I got out --

10 Q. Which side were you on?

11 A. I'm on the left side. I ride behind the  
12 driver.

13 Q. Who was the driver?

14 A. Donald Reeb, I believe.

15 Q. That's what he said, so go ahead.

16 A. Got out, AMR was there ahead of us, just  
17 parked ahead of us. The police were there, so we  
18 didn't grab our medical gear because, if AMR is there,  
19 they have their gear; walked up to the scene.

20 There seemed to be plenty of hands already  
21 attending to the patient, so just kind of stood  
22 around, looked for scene safety, looked for people  
23 trying to run through the scene there, because it was  
24 in the middle of an intersection, or a crosswalk; and  
25 talked with one of the officers and helped out where

1 needed.

2 Q. So you're in a supportive role --

3 A. Yes.

4 Q. -- rather than primary?

5 A. That's correct.

6 Q. And what conversation did you have with the  
7 officer that you spoke with?

8 A. I do not remember. It was not based on the  
9 job or the scene. It was based on --

10 Q. How are you, what are you doing?

11 A. Yeah. How's it going? I haven't seen you in  
12 a while.

13 Q. Do you remember what his name was?

14 A. I do not, no.

15 Q. Would you recognize him if I showed you a  
16 picture of him?

17 A. I could try.

18 Q. Exhibits 80 and 81.

19 (A document was handed to the witness.)

20 A. No, no.

21 Q. They may have had hats on.

22 So you didn't recognize any of those. If you  
23 would look at Exhibit No. 25 in the book?

24 A. Uh-huh.

25 MR. RICE: Twenty-one?



1 MR. SCHNEIGER: Twenty-five, I think.

2 MR. STEENSON: Twenty-one.

3 MR. SCHNEIGER: Twenty-one, excuse me.

4 Q. (By Mr. Schneiger) Tell me where you are in  
5 this scene.

6 A. I'm in the gray shirt with the long, blondish  
7 hair, and the baseball hat.

8 Q. Okay. And is that -- are you in turnouts?

9 A. I am, bottoms.

10 Q. Bottoms, okay.

11 A. Top is an unissued T-shirt.

12 Q. Okay. And do you see the police officer that  
13 you were talking to there?

14 A. Yes.

15 Q. And you're pointing to the left of  
16 Mr. Malloy. Correct?

17 A. Left of Mr. Malloy, right of Donald Reeb.

18 Q. And that conversation didn't have anything to  
19 do with what happened; is that right?

20 A. It did not.

21 Q. So there you are. There's a photograph of  
22 you --

23 A. Uh-huh.

24 Q. -- with the others.

25 A. Uh-huh.

1 Q. Do you pretty much stand there and you're  
2 just chatting with the police as the paramedics are  
3 doing their job?

4 A. Correct.

5 Q. And I think you mentioned in your statement  
6 that there were quite a few bystanders around?

7 A. That's correct.

8 Q. What were they doing?

9 A. The usual, looking, gawking; couldn't hear  
10 what they were saying, but just onlookers.

11 Q. And did you hear any comments about what  
12 might have happened from the bystanders, any  
13 complaints?

14 A. None. They were easily a street away  
15 removed.

16 Q. I see. What was the closest that they were?  
17 You know, like across the street or --

18 A. Yeah, basically the Blue Hour sits right  
19 here, so that would be the closest. There's a  
20 restaurant here. This street's wide enough for  
21 dual-lane traffic, so whatever, 20 feet, 25 feet, is a  
22 guess.

23 Q. Okay. So those things probably aren't going  
24 to come out very well on the transcript as to where  
25 you were pointing, but can you indicate with pointing

1 with your finger as to where those individuals would  
2 be? and then I'll see if I can describe it.

3 A. They would be just east of cop car number  
4 6038.

5 Q. And you're looking at what was marked as  
6 Exhibit No. 75. Okay. Just east of there; is that  
7 right?

8 A. Uh-huh.

9 Q. And did you see any others west of there;  
10 that is, towards your truck?

11 A. No, I did not.

12 Q. Okay. And how about north or south?

13 A. I did see some on the northeast corner of  
14 Glisan and 13th -- or Everett and 13th.

15 Q. And that would be to the side where you can  
16 see a fire hydrant?

17 A. Yeah, but then the east side of the road.

18 Q. The east side, okay.

19 A. Uh-huh.

20 Q. Were you taking notes that day?

21 A. No, I was not.

22 Q. Who was?

23 A. I do not know.

24 Q. But you're sure you were not?

25 A. Positive I was not.

1 Q. Why?

2 A. It's not my job.

3 Q. Whose job is it?

4 A. It can vary. The paramedic or the driver are  
5 usually the two. If the paramedic is also the  
6 officer, it can be delegated down to someone else, but  
7 if the paramedic rides in the back, then he usually  
8 does it himself.

9 Q. And do you remember where Mr. Kopy was  
10 riding that day?

11 A. He was the officer.

12 Q. Okay. And where was he riding, in the back?

13 A. He's in the front seat, right side.

14 Q. What we would call shotgun?

15 A. Yeah, correct.

16 Q. And Mr. Reeb is driving. Correct?

17 A. Correct.

18 Q. And you're behind the driver?

19 A. Correct.

20 Q. And where is Mr. Malloy?

21 A. To the right of me, in the rear right.

22 Q. Tell me what you recall of what was going on  
23 in terms of, if you saw anything, in terms of the  
24 assessment of Mr. Chasse and the things that were  
25 being done with him.

1 A. The -- the only hands-on assessment I  
2 remember was them taking a blood sugar.

3 Q. Do you remember who did that?

4 A. I cannot say, no.

5 Q. You didn't do it?

6 A. I did not.

7 Q. Did you do any of the vital signs?

8 A. No.

9 Q. Would you turn to page 2 of your statement?

10 A. Uh-huh.

11 Q. The first response that you have, I just want  
12 to confirm some of the things that you said. And  
13 here's what you said.

14 A. Uh-huh.

15 Q. The patient was asked a few questions. Do  
16 you see where I am?

17 A. I do not.

18 Q. I skipped about two lines down.

19 A. Got you.

20 Q. Okay. The patient was asked a few questions,  
21 uh, he could not respond properly from what I could  
22 tell. Uh, he was asked his birth date and rattled off  
23 a series of numbers that would not make sense to  
24 anyone. He was white, uh, pale white. And I assume  
25 that you mean his skin.

1 A. Uh-huh, correct.

2 Q. And he was sweating, looked like he just ran  
3 or did something physical. Mumbling, screaming.  
4 Okay?

5 A. Uh-huh.

6 Q. I remember he had a backpack on-scene. The  
7 AMR medic gal, I don't know her name, had picked up  
8 our LIFEPAK 12 from right next to him and left with  
9 it, and he thought we were taking his backpack.

10 Are those all accurate statements?

11 A. That is correct.

12 Q. So, just going back, what he was saying was  
13 not making any sense, I take it?

14 A. Unintelligible, yes, correct.

15 Q. And when you looked at his color, it was pale  
16 or white?

17 A. Correct.

18 Q. And when you're trained as a paramedic,  
19 you're trained to assess a person's skin in terms of  
20 doing your preliminary assessment of the patient.  
21 Correct?

22 A. Correct.

23 Q. And the AMR medics also noted that his skin  
24 seemed to be pale or not normal.

25 A. Uh-huh.

1 Q. Would that be consistent with your vision as  
2 well, what you saw?

3 A. Yes. He was pale.

4 Q. You said that he was sweating and looked like  
5 he had just ran or did something physical. Are you  
6 referring to his breathing?

7 A. No, I'm referring to sweating as -- that's  
8 what caused him to look like he was doing something  
9 physical was sweating.

10 Q. When you first came there, was he lying there  
11 quietly, at least at first?

12 A. Yes, at first.

13 Q. And the paramedics from AMR said that also,  
14 that when they arrived that he was lying there  
15 quietly, not saying anything. That would be  
16 consistent with what you saw as well, at least at  
17 first?

18 A. Yes, at first.

19 Q. And at points did he start mumbling and  
20 screaming?

21 A. Yes, he did.

22 Q. And when he -- strike that.

23 When the female paramedic from AMR started  
24 walking back to their ambulance with their LIFEPAK 12,  
25 did he think that she was taking his backpack away?

1 A. Yes. He yelled for his backpack at that time  
2 that she took it from beside him.

3 Q. And what did he say?

4 A. Backpack, backpack.

5 Q. Okay. So nothing really complete in terms of  
6 a sentence, but, Backpack, backpack?

7 A. Uh-huh.

8 Q. Yes?

9 A. Correct.

10 Q. And he also said, mentioned something about  
11 wanting to go to the river?

12 A. That is correct.

13 Q. And he said that several times, did he not?

14 A. Correct.

15 Q. What did you understand that to mean, if  
16 anything?

17 A. Nothing. I understand it to mean nothing.

18 Q. Did he at one point say or yell, Don't leave  
19 me, don't leave me?

20 A. I do not recall, no.

21 Q. When the police -- strike that.

22 And then in the next set of answers you said  
23 there was blood coming from his mouth, but it was hard  
24 to tell if that was stomach. He didn't look -- we  
25 didn't look in his mouth or anything, so it was hard



1 to tell.

2 Are you saying it's hard to tell where it was  
3 coming from, it might have come from his stomach?

4 A. Yes.

5 Q. And what position was he lying in?

6 A. I recall right -- on his right side.

7 Q. And was his chest at all on the ground?

8 A. No.

9 Q. And at this time were the paramedics or at  
10 some time were they taking his blood pressure?

11 A. I do not know.

12 Q. Did you see them take the blood pressure with  
13 the LIFEPAK?

14 A. I did not.

15 Q. Did you see them do anything other than the  
16 stick for the blood sugar?

17 A. I do not recall, no.

18 Q. Do you recall the stick for the blood sugar?

19 A. The actual act of sticking, no, I do not, but  
20 I remember that they had to stick him in the forearm.

21 Q. Why was that?

22 A. He was being fidgety.

23 Q. And were his hands sort of clamped-up?

24 A. No.

25 Q. Okay. But it was decided that it would be

1 better to take it from the forearm?

2 A. Correct.

3 Q. And the prick was made in the forearm then?

4 A. I do not recall that, no.

5 Q. Did he start to squirm when they stuck him in  
6 the forearm?

7 A. I do not recall that either.

8 Q. So I think you go on to say on page 3,  
9 there's sort of a conclusion, that -- this is your  
10 first response, about line three, He was, uh, mentally  
11 not there, I believe, in my opinion.

12 Does that sort of sum it up?

13 A. That's correct.

14 Q. And your paramedic, Mr. Kopy, said that in  
15 his opinion on his report that Mr. Chasse was not  
16 oriented in any way. Is that consistent with what  
17 you're saying?

18 MR. RICE: Objection as to form. Go ahead.

19 Q. (By Mr. Schneider) Let's go back. Why don't  
20 you get the report that Mr. Kopy signed and have you  
21 look at it.

22 MR. STEENSON: 79.

23 Q. (By Mr. Schneider) Would you look at the part  
24 of Exhibit 79 where level of consciousness is noted?

25 MR. RICE: Did you have that earlier? I

1 don't think it's in this pile. Oh, here it is, excuse  
2 me. Here's 79.

3 THE WITNESS: What page?

4 Q. (By Mr. Schneider) Let me come around.

5 MR. RICE: It's the second page. Here.

6 THE WITNESS: Oh.

7 Q. (By Mr. Schneider) Right there.

8 A. No, I -- I did not do an assessment on  
9 whether he was oriented or not.

10 Q. Okay. Would you look at that assessment?  
11 And the orientation questions are oriented to event,  
12 and I take it that N means no.

13 A. Uh-huh.

14 Q. Orientation to person, no; orientation to  
15 place, no; and orientation to time, no.

16 Would those be consistent with what you saw?

17 A. No, I did not assess the patient based on  
18 event, person, place, or time.

19 Q. Okay. Did you think that Mr. Chasse was in a  
20 position to make a decision about how his medical care  
21 should be taken care of?

22 Let me state it another way. Do you think  
23 that Mr. Chasse was competent to give consent to  
24 either go to the jail or consent to go to the  
25 hospital?

1 MR. RICE: Objection as to form. Go ahead.

2 THE WITNESS: I wasn't involved in that  
3 assessment, so no.

4 Q. (By Mr. Schneiger) Based upon what you heard  
5 and the mumblings that you heard from him, did you  
6 think that he was -- had the requisite mental capacity  
7 to make any serious decision?

8 MR. RICE: Objection. Go ahead.

9 THE WITNESS: I'm not involved in that  
10 assessment, so as far as I know he could have, he  
11 couldn't have.

12 Q. (By Mr. Schneiger) You just don't know?

13 A. I just don't know.

14 Q. Okay. Did you see him when he was carried  
15 off?

16 A. Yes, briefly.

17 Q. Tell me what you saw.

18 A. He was handcuffed, hobbled, and officers, I  
19 would say more than two and less than four, carried  
20 him off.

21 Q. Did he make any noise as he was being carried  
22 off?

23 A. Not that I recall.

24 Q. Did it look like a position when he was being  
25 carried off, that, if he had fractured ribs, would

1 cause pain?

2 MR. RICE: Objection. Form. Go ahead.

3 THE WITNESS: I wouldn't know. In my  
4 professional opinion, I don't know what position would  
5 have caused pain.

6 Q. (By Mr. Schneiger) Have you ever had  
7 fractured ribs?

8 A. I have not.

9 Q. And you're a snowboarder..

10 A. Yeah, I know.

11 MR. STEENSON: A good one.

12 MR. SCHNEIGER: Apparently a good one.

13 Q. (By Mr. Schneiger) So, if you turn to page 1  
14 of your statement, which is Exhibit No. 87 --

15 A. Okay.

16 Q. -- you indicated there, and this is about  
17 two-thirds of the way down --

18 A. Uh-huh.

19 Q. -- We spoke with the officers about what had  
20 happened. See that?

21 A. Uh-huh.

22 Q. Uh, what the circumstances were. Sounds like  
23 they were in a foot pursuit and caught up with him and  
24 wanted him to be medically evaluated.

25 A. Uh-huh.

1 Q. So, uh, we continued to medically evaluate  
2 the patient.

3 So are you saying there that you did get some  
4 information about what had happened?

5 A. The only thing I can recall right now was  
6 after the scene had basically been cleared, one of the  
7 officers had mentioned he had been bit, and that's the  
8 only information I received from an officer that I can  
9 remember.

10 Q. Did you look at the bite?

11 A. Yes, I did. He pulled his pant leg up.

12 Q. And what did you see?

13 A. I can't even say which leg it was, but it was  
14 down somewhere between the knee and the ankle, and it  
15 was a little purple mark.

16 Q. Did it look like it had broken the skin?

17 A. I didn't get that close to tell, no.

18 Q. Did he ask you to treat him?

19 A. He did not ask me personally to treat him,  
20 no.

21 Q. Did anyone else approach you with an injury?

22 A. Not that I recall, no.

23 Q. So I was wondering why he asked you to look  
24 at it. Was he seeking advice?

25 A. Not that I recall, no. He had mentioned he

1 had gotten bit, and someone, I can't remember who,  
2 said, Let's see it, and then he was advised to get it  
3 looked at.

4 Q. Did you hear any mention of cocaine or other  
5 drugs being found at the scene?

6 A. I did not.

7 Q. Anything about Mr. Chasse having cocaine?

8 A. I did not, no.

9 (Deposition Exhibit No. 88 was marked for  
10 identification.)

11 Q. Looking at Exhibit 88, do you recognize that  
12 photo as someone you know?

13 A. I do not, no.

14 Q. Is that the officer that you were talking to?

15 A. No, it is not.

16 Q. Did you know anyone that was at the scene?

17 A. By name or association?

18 Q. Or association, yes.

19 A. Yes. We work with these guys on a regular  
20 basis, so just through the process of seeing them on  
21 calls, I knew him enough to say, Hi, how's it going?

22 Q. Okay. And the person you were talking with,  
23 did they have a Portland Police outfit on or a  
24 Multnomah County Sheriff's Office?

25 A. Portland Police.

1            (Deposition Exhibit No. 89 was marked for  
2 identification.)

3            Q.    Do you know an Officer Weldon or an Officer  
4 Bledsoe?

5            A.    The names do not sound familiar, no.

6            Q.    Officer Pahlke?

7            A.    Does not sound familiar.

8            Q.    Officer Humphreys?

9            A.    Does not sound familiar.

10           Q.    Or how about Officer, or Sergeant Nice, sound  
11 familiar?

12           A.    Does not sound familiar.

13           Q.    Looking at Exhibit No. 89, do you recognize  
14 that person?

15           A.    I've seen him before at work, yeah.

16           Q.    And was he one of the officers at the scene?

17           A.    I cannot say, no.

18           Q.    Was he the one that you were talking to?

19           A.    I can't say for sure, no.

20           Q.    Did you have an occasion to look at  
21 Mr. Chasse's hands at any time?

22           A.    Vaguely.

23           Q.    His hands have, at least by one paramedic,  
24 been described as being discolored or possibly blue  
25 and cyanotic. Did you notice anything unusual about



1 his hand color at all?

2 A. I did not.

3 MR. SCHNEIGER: I have no further questions.

4 MR. RICE: You're done.

5 (The deposition concluded at 5:20 p.m.)

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## C E R T I F I C A T E

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I, Robert J. Lehmann, a Certified Shorthand Reporter for Oregon, do hereby certify that, pursuant to stipulation of counsel for the respective parties hereinbefore set forth, GARY SZALAY personally appeared before me at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction; and that the foregoing transcript, pages 1 to 26, both inclusive, constitutes a full, true and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof.

Witness my hand and CSR stamp at Vancouver, Washington, this 4th day of February, 2008.



ROBERT J. LEHMANN  
Certified Shorthand Reporter  
Certificate No. 90-0217