

# EXHIBIT O

## ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

10 Civ. 6005  
(RWS)

-against-

THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO, Tax Id. 873220, Individually and in his Official Capacity, ASSISTANT CHIEF PATROL BUREAU BROOKLYN NORTH GERALD NELSON, Tax Id. 912370, Individually and in his Official Capacity, DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id. 895117, Individually and in his Official Capacity, CAPTAIN THEODORE LAUTERBORN, Tax Id. 897840, Individually and in his Official Capacity, LIEUTENANT JOSEPH GOUGH, Tax Id. 919124, Individually and in his Official Capacity, SGT. FREDERICK SAWYER, Shield No. 2576, Individually and in his Official Capacity, SERGEANT KURT DUNCAN, Shield No. 2483, Individually and in his Official Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id. 915354, Individually and in his Official Capacity, LT. TIMOTHY CAUGHEY, Tax Id. No. 885374, Individually and in his Official Capacity, SERGEANT SHANTEL JAMES, Shield No. 3004, Individually and in her Official Capacity, SERGEANT RICHARD WALL, Shield No. 3099, Individually and in his Official Capacity, SERGEANT ROBERT W. O'HARE, Tax Id. 916960, Individually and in his Official Capacity, SERGEANT SONDR A WILSON, Shield No. 5172, Individually and in her Official Capacity, LIEUTENANT THOMAS HANLEY, Tax Id. 879761, Individually and in his Official Capacity, CAPTAIN TIMOTHY TRAINOR, Tax Id. 899922, Individually and in his Official Capacity, and P.O.'s "JOHN DOE" #1-50, Individually and in their Official Capacity (The name John Doe being fictitious, as the true names are presently unknown) (collectively referred to as "City Defendants"), FDNY LIEUTENANT ELISE HANLON, individually and in her official capacity as a lieutenant with the New York City Fire Department, JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV, Individually and in his Official Capacity, DR. LILIAN ALDANA-BERNIER, Individually and in his Official Capacity and

#1-50, Individually and in their Official Capacity  
(The name John Doe being fictitious, as the true  
names are presently unknown),

Defendants.

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20 Corporate Woods Blvd.  
Loudonville, New York 12211  
December 11, 2013  
10:22 a.m.

EXAMINATION BEFORE TRIAL of LARRY C. SCHOOLCRAFT,  
a Non-Party Witness in the above entitled action,  
held pursuant to Court Order at the above place  
and time, before a Notary Public within and for  
the State of New York.

1 LARRY C. SCHOOLCRAFT

2 residence?

3 A. No.

4 Q. Have you ever paid rent to live at that  
5 residence?

6 A. No.

7 Q. When did you sell the residence to Mr.  
8 Varnardum?

9 A. May of this year.

10 Q. Do you recall being served with this  
11 subpoena to come here and testify  
12 today?

13 A. I was not served personally.

14 Q. Do you recall, prior to today's  
15 subpoena, being served with a subpoena  
16 to come and testify on a different  
17 date?

18 A. Correct.

19 Q. Do you recall being served with what  
20 are known as document requests and  
21 interrogatories along with that initial  
22 subpoena?

23 A. Correct.

24 Q. Did you bring with you today any  
25 responses to those documents requests

1 LARRY C. SCHOOLCRAFT

2 or interrogatories?

3 A. No.

4 Q. Okay. I'm going to ask you, in the  
5 interim, although I do believe you  
6 still need to respond, I will ask you  
7 those questions before we move forward.

8 Do you have, in your possession,  
9 any audio recordings pertaining to your  
10 son's allegations against the  
11 defendants in lawsuit that we are here  
12 to discuss today?

13 A. I'm sure I do.

14 Q. How many audio, separate audio  
15 recordings, do you have pertaining to  
16 your son's allegations against the  
17 defendants in the lawsuit we are here  
18 to discuss?

19 A. I have no idea.

20 Q. Do you have more than ten?

21 A. I have no idea.

22 Q. What format are they in?

23 A. They would be on a digital recorder.

24 Q. Where is the digital recorder?

25 A. I have no idea.

1 LARRY C. SCHOOLCRAFT

2 Q. Did you ever ask to be paid by Mr.  
3 Rayman?

4 A. No.

5 Q. Did Mr. Rayman ever offer to pay either  
6 of you?

7 A. For the photographs.

8 Q. How much did he offer to pay you for  
9 the photographs?

10 A. \$100 per photograph.

11 Q. Did he tell you that he was going to  
12 pay for those photographs, did he do  
13 that in writing or would that be a  
14 phone conversation or something else?

15 A. Phone.

16 Q. You mentioned that you had spoke to Mr.  
17 Levitt about the allegations in the  
18 lawsuit; is that right?

19 A. Yes.

20 Q. How many times have you spoken with Mr.  
21 Levitt?

22 A. Dozens and dozens of times.

23 Q. More than 50?

24 A. I would say no more than 50.

25 Q. How was it that you came -- how was it