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(Continued.)

CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Defendant

DR. LILIAN ALDANA-BERNIER
One Whitehall Street
New York, New York 10004

BY: MATTHEW J. KOSTER, ESQ.

MARTIN CLEARWATER & BELL, LLP
Attorneys for Defendant
JAMAICA HOSPITAL MEDICAL CENTER

220 East 42nd Street
New York, New York 10017

BY: BRIAN OSTERMAN, ESQ.

Also Present: Magdalena Bauza

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S T I P U L A T I O N S :

IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties hereto, that this examination may be sworn to before any Notary Public.

IT IS FURTHER STIPULATED AND AGREED that the filing and certification of the said examination shall be waived.

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

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E L I S E H A N L O N, a Non-Party Witness herein, having been first duly sworn by a Notary Public within and for the State of New York, was examined and testified as follows:

EXAMINATION BY
MR. SMITH:

Q. Will you state your name and address for the record, please.

A. Elise Hanlon.

MR. SHAFFER: 100 Church Street, New York, New York.

MR. SMITH: We are going on the record, it's 10:19. We are at my office, Nathaniel Smith, 111 Broadway, suite number 1305. Starting the deposition of Elise Hanlon.

THE WITNESS: Yes.

MR. SHAFFER: Before we start, I just ask that the witness be given a chance to review the transcript that's generated here today pursuant to

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ELISE HANLON

Federal Rule 30 (e) (1).

MR. SMITH: Okay. And before we start with the witness, are you representing the witness?

MR. SHAFFER: Correct.

MR. SMITH: Will you accept service of process of any trial subpoenas or any subpoenas required for the witness to appear because you have given the 100 Church Street address, which is the Law Department address, right?

MR. SHAFFER: That is correct. If that address changes you will be notified immediately upon its change.

MR. SMITH: You're not answering my question --

MR. SHAFFER: Yes.

MR. SMITH: Will you accept service of process? Otherwise, I will need to have the witness' personal address.

MR. SHAFFER: The same as it's been in every other deposition.

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ELISE HANLON

MR. SMITH: Which is?

MR. SHAFFER: Yes. Contingent upon us still representing the witness and if not, you will be notified of that change immediately and you will have a new address forthwith.

MR. SMITH: I will need, not just an address, but also contact information.

MR. SHAFFER: Correct.

Q. Morning, ma'am.

A. Good morning.

Q. My name is Nathaniel Smith. I'm representing Adrian Schoolcraft in the lawsuit against various individuals including the City of New York.

This morning I am going to be asking you a series of questions and there's only one really important rule since you're under oath and that is that you understand my question and you answer the question to the best of your ability.

Do you understand that?

A. Yes.

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ELISE HANLON

Q. It's important that if there is something unclear about my question that you let me know; okay?

A. Yes.

Q. And the reason why that's important is because the court reporter is taking down the questions that I'm asking and the answers that you're providing and if you don't say I don't understand or it's not clear or could you rephrase that and you just answer the question, then your statements which, like I said, are being taken under oath, will reflect those statements. So it's important for you and for the record and for me that you express any confusion you may have about the question; okay?

A. Yes.

Q. Just because I'm a lawyer and I'm wearing a tie doesn't mean that my questions are formed well. Sometimes they're formed badly. In that case, please let me know; okay?

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ELISE HANLON

Q. Are you currently employed?

A. Yes.

Q. By whom?

A. New York City Fire Department.

Q. How long have you been employed
by the New York City Fire Department?

A. Since 1991.

Q. And what did you do before the
fire department?

A. I worked for a private
ambulance company.

Q. Which one?

A. Mercy.

Q. Where is Mercy?

A. No longer in existance.

Q. Is Mercy an ambulance service or
was it a hospital?

A. Ambulance service.

MR. SHAFFER: Objection.

Q. Where was it located?

A. Island Park.

Q. Where is that?

A. Long Island.

Q. How long did you work for Mercy?

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ELISE HANLON

A. A year.

Q. And were you an EMT at Mercy?

A. Yes.

Q. What did you do before working
for Mercy?

A. I worked for Nationwide
Ambulance.

Q. And Nationwide is another
private ambulance service?

A. Yes.

Q. Where are they located?

A. No longer in existance.

Q. Where were they located?

A. Rockaway.

Q. Rockaway, Queens?

A. Yes.

Q. Were you an EMT for Nationwide?

A. Yes.

Q. How long did you work for them?

A. About a year.

Q. What did do you before working
for Nationwide?

A. In school.

Q. What school?

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ELISE HANLON

A. No.

Q. Have you ever seen any police officer or another law enforcement officer EDP?

A. No.

Q. Have you ever seen a chief or assistant chief for the NYPD at a scene where there was a potential or actual EDP situation?

MR. SHAFFER: Objection.

A. Not that I recall.

MR. SMITH: All right, I don't have anymore questions. Thank you very much. For now I don't have anymore questions.

EXAMINATION BY

MR. OSTERMAN:

Q. Lieutenant, I just have a few very quick.

Other than what you testified to here today, did you have any contact or speak with any other staff or personnel at Jamaica Hospital at any time regarding Mr. Schoolcraft or the incident on October 31,

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ELISE HANLON

2009?

A. No.

Q. Did you have any contact or speak with any doctors or nurses at Jamaica Hospital regarding Mr. Schoolcraft or the incident on October 31, 2009?

A. No.

Q. Did you instruct or direct anyone to speak or contact anyone at Jamaica Hospital?

A. No.

Q. Did you speak with a Dr. Isakov at any time?

A. No.

Q. Did you speak with a Dr. Aldana-Bernier at any time?

(Continued on next page ton include Jurat.)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ADRIAN SCHOOLCRAFT,
Plaintiff,

Case No:

- against -

10 CV 06005

THE CITY OF NEW YORK; ET AL.,

CONFIDENTIAL

Defendants.

-----X

111 Broadway
New York, New York

April 10, 2014
10:34 a.m.

CONFIDENTIAL DEPOSITION OF TIMOTHY TRAINOR,
pursuant to Notice, taken at the above place,
date and time, before DENISE ZIVKU, a Notary
Public within and for the State of New York.

Page 2

1 APPEARANCES:
 2
 3 NATHANIEL B. SMITH, ESQ.
 Attorneys for Plaintiff
 4 111 Broadway
 New York, New York 10006
 5
 6 JOHN LENOIR, ESQ.
 Attorneys for Plaintiff
 7 829 Third Street NE
 Washington, D.C. 20002
 8
 9 NEW YORK CITY LAW DEPARTMENT
 OFFICE OF CORPORATION COUNSEL
 Attorneys for Defendant
 10 THE CITY OF NEW YORK
 100 Church Street
 New York, New York 10007
 11 BY: SUZANNA PUBLICKER METTHAM, ESQ.
 12
 13 SCOPPETTA SEIFF KRETZ & ABERCROMBIE
 Attorneys for Defendant
 14 STEVEN MAURIELLO
 444 Madison Avenue
 New York, New York 10022
 15 BY: WALTER A. KRETZ, JR., ESQ.
 16
 17
 18 IVONE, DEVINE & JENSEN, LLP
 Attorneys for Defendant
 19 DR. ISAK ISAKOV
 20 2001 Marcus Avenue
 Lake Success, New York 11042
 21 BY: BRIAN LEE, ESQ.
 22
 23 (Continued.)
 24
 25

Page 4

1 STIPULATIONS:
 2 IT IS HEREBY STIPULATED AND AGREED by
 3 and between the attorneys for the respective
 4 parties hereto, that this examination may be
 5 sworn to before any Notary Public.
 6
 7 IT IS FURTHER STIPULATED AND AGREED
 8 that the filing and certification of the said
 9 examination shall be waived.
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Page 3

1 (Continued.)
 2
 3 CALLAN, KOSTER, BRADY & BRENNAN, LLP
 Attorneys for Defendant
 4 DR. LILIAN ALDANA-BERNIER
 One Whitehall Street
 New York, New York 10004
 5 BY: MATTHEW J. KOSTER, ESQ.
 6
 7
 8 MARTIN CLEARWATER & BELL, LLP
 Attorneys for Defendant
 JAMAICA HOSPITAL MEDICAL CENTER
 9 220 East 42nd Street
 New York, New York 10017
 10 BY: BRIAN OSTERMAN, ESQ.
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 2 (WHEREUPON, THE FOLLOWING
 3 TRANSCRIPT WAS DESIGNATED CONFIDENTIAL
 4 BY COUNSEL PURSUANT TO PROTECTIVE
 5 ORDER.)
 6 MR. SMITH: We are going on the
 7 record, it is 10:34. We are taking the
 8 deposition of Captain Timothy Trainor
 9 at my offices, 111 Broadway. Today is
 10 April 10, 2014.
 11 TIMOTHY TRAINOR, a Defendant
 12 herein, having been first duly sworn by a
 13 Notary Public within and for the State of
 14 New York, was examined and testified as
 15 follows:
 16
 17 EXAMINATION BY
 18 MR. SMITH:
 19
 20 Q. Will you state your name and
 21 address for the record, please.
 22 A. My name is Timothy, Last name is
 23 Trainor, spelled T-r-a-i-n-o-r. My address
 24 is One Police Plaza, New York, New York
 25 10038.

Page 6

1 TIMOTHY TRAINOR
 2 MR. SMITH: Ms. Mettham, we have
 3 the same agreement with respect to
 4 Captain Trainor, which is if there is a
 5 trial where I need to serve process you
 6 will accept service of process on his
 7 behalf.
 8 MS. PUBLICKER METTHAM: To the
 9 extent we're still representing him,
 10 yeah.
 11 MR. SMITH: Otherwise, you will
 12 provide me with information where I can
 13 effectuate service?
 14 MS. PUBLICKER METTHAM: Yes.
 15 MR. SMITH: Okay, great.
 16 Q. Good morning, Captain.
 17 A. Good morning.
 18 Q. As I indicated earlier when we
 19 were off the record, my name is Nathaniel
 20 Smith. I represent Adrian Schoolcraft. I
 21 am going to be asking you some questions
 22 this morning and this afternoon.
 23 There is a few ground rules,
 24 maybe you know them, maybe you don't. I
 25 just want to express the most important one,

Page 7

1 CONFIDENTIAL - TIMOTHY TRAINOR
 2 which is that it's important since you've
 3 just been sworn to tell the truth that you
 4 understand the question. You understand
 5 that, right?
 6 A. I understand.
 7 Q. And you understand that you're
 8 under oath and you're obligated to tell the
 9 truth?
 10 A. Yes.
 11 Q. And as part of that oath, it's
 12 important that you understand the question,
 13 right?
 14 A. Yes.
 15 Q. So if there's anything about my
 16 question that's unclear or you're unsure,
 17 please let me know and I will try to
 18 rephrase it.
 19 A. Understood.
 20 Q. Where are you currently working?
 21 A. One Police Plaza.
 22 Q. What's your position?
 23 A. Captain.
 24 Q. Do you work in a particular
 25 division?

Page 8

1 CONFIDENTIAL - TIMOTHY TRAINOR
 2 A. I work in the police
 3 commissioner's office.
 4 Q. What do you do with the police
 5 commissioner's office?
 6 A. I am the head of his security
 7 detail.
 8 Q. Who do you report to?
 9 A. Deputy Chief James O'Neil.
 10 Q. How many people report to you?
 11 MS. PUBLICKER METTHAM:
 12 Objection. You could answer.
 13 A. Thirteen.
 14 Q. Are any of these 13 people
 15 involved in this case, to your knowledge?
 16 MS. PUBLICKER METTHAM:
 17 Objection.
 18 A. No.
 19 Q. How long have you had this
 20 position as captain and the head of security
 21 detail for the commissioner?
 22 A. I started on December 12, 2013.
 23 Q. Prior to that what did you do?
 24 A. Prior to this assignment I was
 25 commanding officer of the Brooklyn North

Page 9

1 CONFIDENTIAL - TIMOTHY TRAINOR
 2 Investigations Unit.
 3 Q. For what period of time were you
 4 the commanding officer of Brooklyn North
 5 investigations Unit?
 6 A. I was the commanding officer of
 7 the Brooklyn North Investigations Unit from
 8 July of 2002, until December 11, 2013.
 9 Q. As the commanding officer of
 10 Brooklyn North Investigations Unit, who did
 11 you report to?
 12 MS. PUBLICKER METTHAM:
 13 Objection. You could answer.
 14 A. I reported to the patrol borough
 15 adjutant.
 16 Q. Was that one individual during
 17 that period of time that you were the
 18 commanding officer?
 19 A. It was many different
 20 individuals.
 21 Q. Can you identify who the
 22 individuals for whom you were reporting to
 23 from 2009 through the end of 2013?
 24 MS. PUBLICKER METTHAM:
 25 Objection. You can answer.

Page 246

1 CONFIDENTIAL - TIMOTHY TRAINOR
 2 best I could remember, we were getting
 3 information, you know, that the NYPD, you
 4 know, the rant boards use these bulletin
 5 boards, people were just talking. This is
 6 information that was out in the
 7 stratosphere. When I learned about it, I
 8 just simply can't give you the date I knew.
 9 Q. Okay. I understand, thank you.
 10 Have you ever had any contact
 11 with any personnel from Jamaica Hospital?
 12 A. Never.
 13 MR. SMITH: All right, I want to
 14 take two minutes. Check with my
 15 colleague. I think I'm almost done.
 16 Going off the record, it's 5:45.
 17 (Whereupon, a recess was taken.)
 18 MR. SMITH: Going back on the
 19 record, it's 5:49. Thank you very
 20 much, Captain, I don't have any more
 21 questions at this time.
 22 MS. PUBLICKER METTHAM: I have
 23 just a couple.
 24 EXAMINATION BY
 25 MS. PUBLICKER METTHAM:

Page 247

1 CONFIDENTIAL - TIMOTHY TRAINOR
 2 Q. Captain Trainor, did you ever go
 3 to Schoolcraft's apartment in Johnstown,
 4 New York?
 5 A. No.
 6 Q. Did you ever kick or pound on
 7 Officer Schoolcraft's door?
 8 A. No.
 9 Q. Did you ever engage in efforts
 10 purposely designed to intimidate and harass
 11 Mr. Schoolcraft?
 12 A. No.
 13 MS. PUBLICKER METTHAM: I have
 14 no further questions.
 15 EXAMINATION BY
 16 MR. LEE:
 17 Q. Did you ever speak to or do you
 18 know Dr. Isakov?
 19 A. No, I do not.
 20 Q. Do you know Dr. Aldana Bernier?
 21 A. No.
 22 Q. Did you ever speak to her about
 23 Mr. Schoolcraft?
 24 A. No, I did not.
 25 Q. Did you speak to anybody at

Page 248

1 CONFIDENTIAL - TIMOTHY TRAINOR
 2 Jamaica Hospital at any time?
 3 A. Regarding Schoolcraft?
 4 Q. Correct.
 5 A. Never.
 6 Q. Did you ever direct anybody from
 7 the NYPD to speak to anybody at Jamaica
 8 about Mr. Schoolcraft?
 9 A. Never.
 10 MR. LEE: Thank you.
 11 (Time noted: 5:49 p.m.)
 12 _____
 13 TIMOTHY TRAINOR
 14 _____
 15 Subscribed and sworn to before me this
 16 _____
 17 _____ day of _____ 2014.
 18 _____
 19 _____, Notary
 20 Public.
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1 I-N-D-E-X
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 3 WITNESS ATTORNEY PAGE
 4 TIMOTHY TRAINOR MR. SMITH 5
 5 MS. PUBLICKER METTHAM 246
 6 MR. LEE 247
 7
 8 E-X-H-I-B-I-T-S
 9 PLAINTIFF'S DESCRIPTION PAGE
 10 76 Document 28
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 15 81 Document 96
 16 82 Document 98
 17 83 Document 119
 18 84 Document 121
 19 85 Document 125
 20 86 Document 125
 21 87 Document 129
 22 88 Document 132
 23 89 Document 138
 24 90 Document 142
 25 (Continued)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ADRIAN SCHOOLCRAFT,
Plaintiff,

Case No:
- against - 10 CV 06005

THE CITY OF NEW YORK, ET AL.,
Defendants.

-----X
111 Broadway
New York, New York

April 11, 2014
10:21 a.m.

DEPOSITION OF WILLIAM GOUGH, pursuant to
Notice, taken at the above place, date and
time, before DENISE ZIVKU, a Notary Public
within and for the State of New York.

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A P P E A R A N C E S:

NATHANIEL B. SMITH, ESQ.
Attorneys for Plaintiff
111 Broadway
New York, New York 10006

JOHN LENOIR, ESQ.
Attorneys for Plaintiff
829 Third Street NE
Washington, D.C. 20002

NEW YORK CITY LAW DEPARTMENT
OFFICE OF CORPORATION COUNSEL
Attorneys for Defendant
THE CITY OF NEW YORK
100 Church Street
New York, New York 10007

BY: SUZANNA PUBLICKER METHAM, ESQ.

SCOPPETTA SEIFF KRETZ & ABERCROMBIE
Attorneys for Defendant
STEVEN MAURIELLO
444 Madison Avenue
New York, New York 10022
BY: WALTER A. KRETZ, JR., ESQ.

IVONE, DEVINE & JENSEN, LLP
Attorneys for Defendant
DR. ISAK ISAKOV
2001 Marcus Avenue
Lake Success, New York 11042
BY: BRIAN LEE, ESQ.

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(Continued.)

CALLAN, KOSTER, BRADY & BRENNAN, LLP
Attorneys for Defendant

DR. LILIAN ALDANA-BERNIER
One Whitehall Street
New York, New York 10004

BY: MATTHEW J. KOSTER, ESQ.

MARTIN CLEARWATER & BELL, LLP
Attorneys for Defendant

JAMAICA HOSPITAL MEDICAL CENTER
220 East 42nd Street
New York, New York 10017

BY: BRIAN OSTERMAN, ESQ.

1 S T I P U L A T I O N S :

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3 and between the attorneys for the respective
4 parties hereto, that this examination may be
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MR. SMITH: We are going on the record. It's 10:21 and this is April 11, 2014 and we are taking the deposition of Lieutenant Gough.

Am I pronouncing that correctly?

THE WITNESS: Yes, you are.

MR. SMITH: Great. At my office at 111 Broadway, New York, New York. The deposition is being videotaped and the court reporter is here and will swear in the witness. Thank you.

W I L L I A M G O U G H, a Defendant herein, having been first duly sworn by a Notary Public within and for the State of New York, was examined and testified as follows:

EXAMINATION BY

MR. SMITH:

Q. Will you state your name and address for the record, please.

A. William Gough, 211 Union Avenue, Brooklyn, New York 11212.

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WILLIAM GOUGH

Q. Is that your home address?

A. No.

MR. SMITH: As we've done in the past with other defendants, Suzanna, will you agree to accept service of process on behalf of Lieutenant Gough in this case?

MS. PUBLICKER METTHAM: To the extent we still represent him at that time, yes.

MR. SMITH: If you don't represent him, you will provide the necessary information to serve process?

MS. PUBLICKER METTHAM: Yes.

Q. Where are you currently working?

A. The Brooklyn North Investigations Unit, New York City Police Department.

Q. And the address that you gave, is that Brooklyn North Investigations Unit's address?

A. Yes.

Q. Do they have more than one location?

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WILLIAM GOUGH

A. No.

Q. How long have you worked at the Brooklyn North Investigations Unit?

A. Since December '06.

Q. What's your current title?

A. I am a lieutenant in the New York City Police Department.

Q. What's your year of birth?

A. 1972.

Q. What's your highest level of education?

A. I have 96 college credits.

Q. Any course of study?

MS. PUBLICKER METHAM:

Objection. You can answer.

A. Liberal arts.

Q. So when did you graduate high school?

A. June of 1990.

Q. After high school what form of employment did you have?

A. Various forms of employment.

Q. Okay, I'll take the first one.

A. I recollect I worked for Kennedy

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WILLIAM GOUGH

to the recording, you believe that everything you said was correct?

MS. PUBLICKER METHAM:

Objection. You could answer.

A. Yes.

Q. And you listened to the entire recording?

MS. PUBLICKER METHAM:

Objection. You could answer.

A. Yes.

Q. Was it about 20 minutes?

A. I didn't -- I don't know if it's 20 minutes.

Q. You believe you listened to the entire recording of the interview that you had with IAB?

A. I believe so.

MR. SMITH: All right, thank you, Lieutenant. I don't have any more questions.

EXAMINATION BY

MR. KOSTER:

Q. Good afternoon, I just have a couple of questions for you. Same rules

1 WILLIAM GOUGH

2 apply.

3 Have you spoken with a Dr.
4 Aldana Bernier regarding Adrian Schoolcraft?

5 A. Never.

6 Q. Have you ever heard of Dr.
7 Aldana Bernier?

8 A. I don't believe so.

9 Q. Have you ever heard of her
10 outside the context of this lawsuit?

11 A. I don't think so.

12 Q. Have you ever heard of a Dr.
13 Isakov?

14 A. I don't think so.

15 Q. Have you ever communicated in
16 any way with Dr. Isakov --

17 A. No.

18 Q. -- regarding Adrian Schoolcraft?
19 Is that a no?

20 A. No.

21 Q. Were you ordered to provide any
22 information to anyone at Jamaica Hospital?

23 A. No.

24 Q. Did you order anyone to provide
25 any information to Jamaica Hospital

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WILLIAM GOUGH

concerning Adrian Schoolcraft?

A. No.

Q. I believe you said that you did not go to Jamaica Hospital with --

A. I did not go to Jamaica Hospital.

Q. -- with Mr. Schoolcraft?

A. I did not.

Q. Did you speak to anyone at Jamaica Hospital regarding Adrian Schoolcraft?

A. No.

MR. KOSTER: I have no further questions.

MR. SMITH: We are going off, 4:28, going off the record.

(Time noted: 4:28 p.m.)

WILLIAM GOUGH

Subscribed and sworn to before me this

----- day of ----- 2014.

-----, Notary

Public.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,
Plaintiff,

Case No:
10 CV 06005

- against -

THE CITY OF NEW YORK, ET AL.,

Defendants.

-----X

111 Broadway
New York, New York

May 14, 2014
10:24 a.m.

DEPOSITION OF JESSICA MARQUEZ, pursuant to
Notice, taken at the above place, date and
time, before DENISE ZIVKU, a Notary Public
within and for the State of New York.