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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.

1 ELISE HANLON

2 MR. SMITH: Which is?

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

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

11 MR. SHAFFER: Correct.

12 Q. Morning, ma'am.

13 A. Good morning.

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

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

24 Do you understand that?

25 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?

A. Yes.

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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?

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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.  
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 4 111 Broadway  
 New York, New York 10006  
 5  
 6 JOHN LENOIR, ESQ.  
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 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  
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 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.  
 10  
 11 IT IS FURTHER STIPULATED AND AGREED  
 12 that all objections to questions, except as to  
 13 the form of the question, shall be reserved  
 14 for the time of trial.  
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Page 3

1 (Continued.)  
 2  
 3 CALLAN, KOSTER, BRADY & BRENNAN, LLP  
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 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  
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 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,

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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?

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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

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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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Page 249

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  
 11 77 Document 39  
 12 78 Document 65  
 13 79 Document 82  
 14 80 Document 91  
 15 81 Document 96  
 16 82 Document 98  
 17 83 Document 119  
 18 84 Document 121  
 19 85 Document 125  
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 24 90 Document 142  
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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:

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NEW YORK CITY LAW DEPARTMENT  
OFFICE OF CORPORATION COUNSEL  
Attorneys for Defendant  
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BY: SUZANNA PUBLICKER METHAM, ESQ.

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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 :

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.

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

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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

1 WILLIAM GOUGH

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

4 MS. PUBLICKER METHAM:

5 Objection. You could answer.

6 A. Yes.

7 Q. And you listened to the entire  
8 recording?

9 MS. PUBLICKER METHAM:

10 Objection. You could answer.

11 A. Yes.

12 Q. Was it about 20 minutes?

13 A. I didn't -- I don't know if it's  
14 20 minutes.

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

18 A. I believe so.

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

22 EXAMINATION BY

23 MR. KOSTER:

24 Q. Good afternoon, I just have a  
25 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.)

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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.