

# **Transcript of Justin Cooper**

**Date:** March 14, 2019

Case: Judicial Watch, Inc. -v- U.S. Department of State

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1	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA	1	WILLIAM CUTLED DYCKEDTUS VIVE
2		2	WILMER CUTLER PICKERING HALE
3	JUDICAL WATCH, INC.,	3	and DORR, LLP
4	Plaintiff,	4	1875 Pennsylvania Avenue, NW
5	INDEX NO: 14-01242 (RCL)	5	Washington, DC 20006
6	-against-	6	BY: CHARLES SPETH, ESQ.
7	U.S. DEPARTMENT OF STATE,	7	
8	Defendant.	8	
9	х	9	VIDEOGRAPHER: DMITRY ZVONKOV
10		10	
11	DEPOSITION of JUSTIN COOPER, taken by Plaintiff,	11	
12	at 7 World Trade Center, New York, New York, on,	12	
13	March 14, 2019, commencing at 8:07 o'clock a.m.,	13	
14	before Christine Cutrone, a shorthand (Stenotype)	14	
15	reporter and Notary Public within and for the	15	
16	State of New York.	16	
17		17	
18		18	
19		19	
20		20	
21		21	
22		22	
	2		4
1	APPEARANCES:	1	INDEX
2		2	
3	JUDICIAL WATCH	3	WITNESS EXAMINATIONS PAGE
4	Attorney for Plaintiff	4	JUSTIN COOPER MR. BEKESHA 5
5	425 Third Street	5	
6	Suite 800	6	
7	Washington, DC 20024	7	EXHIBITS
8	BY: MICHAEL BEKESHA, ESQ.	8	
9	RAMONA COTCA, ESQ.	9	No. Description Page
10	JAMES PETERSON, ESQ.	10	
11		11	
12		12	interview was marked Plaintiff's
13		13	Exhibit 1
14	U.S. DEPARTMENT OF JUSTICE	14	2 E-mail to Secretary Clinton about 30
15	Attorney for Defendant	15	new setup, was marked Plaintiff's
16	1100 L Street NW	16	Exhibit 2
17	Washingtion, DC 20005	17	3 E-mail was marked Plaintiff's 34
18	BY: ELIZABETH J. SHAPIRO, ESQ.	18	Exhibit 3
19	STEPHEN M. PEZZI, ESQ.	19	4 e-mail chain between witness and 35
20	ROBERT J. PRINCE, ESQ.	20	Secretary Clinton from August 30th
21		21	and August 31, 2011 was marked
22		22	Plaintiff's Exhibit 4
1			

	Conducted on 1	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	5 e-mail between witness, John Davidson, Bryan Pagliano trying to resolve an issue related to Secretary Clinton's Blackberry was marked Plaintiff's Exhibit 5 6 e-mail from the witness to Secretary Clinton on September 25th, 2009 was marked Plaintiff's Exhibit 6 7 two e-mails between witness and Secretary Clinton dated September 29, 2009 was marked Plaintiff's Exhibit 7 8 two e-mails between witness and Secretary Clinton on June 6, 2011 was marked Plaintiff's Exhibit 8 9 e-mails regarding Secretary's Standard Blackberry failing, was marked Plaintiff's Exhibit 9 10 e-mail chain between you Huma 57	1 IT IS HEREBY STIPULATED AND AGREED that the 2 filing and sealing of the within deposition be, 3 and the same are hereby waived; 4 IT IS FURTHER STIPULATED AND 5 AGREED that all objections, except as to the form 6 of the question, be and the same are hereby 7 reserved to the time of the trial; 8 IT IS FURTHER STIPULATED AND AGREED 9 that the within deposition may be sworn to before 10 any Notary Public with the same force and effect 11 as if sworn to before a Justice of this Court; 12 IT IS FURTHER STIPULATED that the 13 transcript is to be certified by the reporter; 14 15 16 17 18 19 20
21	Abedin and Monica Hanley was marked Plaintiff's Exhibit 10	21
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	11 e-mails between myself, Bryan Pagliano, Secretary Clinton and Flores was marked Plaintiff's Exhibit 11 12 ABC News article written by a Marcio Jose Sanchez entitled Coming up Hillary Clinton in 2000 was marked Plaintiff's Exhibit 12	1 THE VIDEOGRAPHER: This begins disk 2 number one in the videotaped deposition of 3 Justin Cooper in the matter of Judicial 4 Watch, Inc., versus U.S. Department of State 5 in the U.S. District Court for the District 6 of Columbia. Today's date is March 14, 7 2019. The time on the video screen is 8 8:07 a.m. The videographer today is Dmitry 9 Zvonkov. The court reporter is Christine 10 Cutrone both with Planet Depos. This video 11 deposition is taking place at Seven World 12 Trade Center on the 45th floor in New York, 13 New York. 14 Will counsel please identify 15 themselves for the record. 16 MR. BEKESHA: Michael Bekesha on 17 behalf of Judicial Watch. 18 MR. PETERSON: James Peterson on 19 behalf of Judicial. 20 MS. COTCA: Ramona Cotca, Judicial. 21 MR. SPETH: Charles Speth on behalf of 22 Justin Cooper.

11 MS. SHAPIRO: Elizabeth Shapiro on 1 counsel or Ms. Shapiro is making an objection, wait behalf of the Department of State. 2 until they're done speaking to give your response. MR. PEZZI: Stephen Pezzi from the 3 Make life a lot easier on the court reporter, because 4 Department of Justice on behalf of the 4 she can only take down one thing at a time. 5 Department of State. With that out of the way, have you MR. PRINCE: Robert Prince from the ever created or setup an e-mail account for Hillary Department of Justice on behalf of the Clinton? 8 Department of State. A Yes. 9 THE VIDEOGRAPHER: Would the court 9 Q How many e-mails accounts have you 10 reporter please swear in the witness. 10 created or setup? To the best of my recollection two or 11 11 12 JUSTIN COOPER, having first been duly 12 three. 13 sworn by a Notary Public, for and within the State When did you create the first one? 13 O 14 of New York, upon being examined, testified as 14 I can't speak. I don't recall when 15 follows: 15 the first would have been setup. But something that 16 16 was used on her blackberry device. If you're 17 EXAMINATION 17 referring to some of the use of the servers that were 18 BY MR. BEKESHA: 18 later setup, I believe that first e-mail address was Good morning, Mr. Cooper. My name is 19 setup in 2009. 20 Michael Bekesha. I'm an attorney for Judicial Watch. 20 O Was there an e-mail address setup 21 I'm here to ask you some questions about one of 21 before that? 22 Judicial Watch's Freedom of Information Act lawsuits She was using a blackberry that -- you 10 1 against the State Department. Specifically questions 1 know, the blackberry service at that time gave you 2 about whether Secretary Clinton's use of a private the offer to use blackberry internet service which 3 e-mail server was intended to stymie FOIL. And was provided by the wireless carrier and she had an 4 whether the State Department was adequately searched e-mail on that service. -- if the State Department adequately searched for Q And you may have just helped set that 6 records responsive to Judicial Watch's FOIL request. 6 up? Before we begin could you please state 7 A I may have set that up. I don't and spell your full name for the record? recall. Justin Cooper J-U-S-T-I-N. Cooper 9 And then so the second one was the one O 10 C-O-O-P-E-R. 10 @Clintonemail.com? Thank you. Also I'd just like to go O 11 A Correct. 12 over a few quick ground rules. Your counsel has --12 O And was there an additional one or 13 may have already talked to you about them, but it 13 additional others besides those? 14 will help the deposition go more smoothly. If you I know at one time we changed her 15 don't hear one of my questions, please let me know 15 e-mail address -- the prefix of her e-mail address on 16 and I'll repeat it. If you don't understand one of my 16 the Clinton e-mail server domain. 17 questions, again, just let me know and I'll try to 17 That was maybe around 2013 after the 18 make it clearer. It's important that you respond out 18 Sidney Blumenthal e-mails made public? 19 loud as opposed to shaking your head or even 19 A That sounds correct. 20 gestures, because the court reporter cannot record 20 I just wanted to establish so we all 21 these sorts of things. Finally it's important that 21 kind of know what e-mail addresses we're talking

22 about. Today our focus is going to be the

22 you wait until I'm done asking my question or if your

15

#### Transcript of Justin Cooper Conducted on March 14, 2019

Clintonemail.com that she used during her tenure at

- 2 the State Department.
- Regarding that e-mail account, do you
- recall when you were first approached to setup that
- Clintonemail.com e-mail account for Secretary
- Clinton?
- A I don't have, again, a specific
- recollection as to when it was we had existing
- 9 servers in place for President's Clinton's office.
- 10 And somewhere either in late '08 or early '09 it was
- 11 a discussion that occurred about creating an e-mail
- 12 address for Secretary Clinton.
- 13 Do you recall who approached you about 14 creating an e-mail account?
- It would have been a discussion with 16 Huma Abedin.
- Do you recall if anybody else were in 17 Q 18 those conversations?
- 19 A Not particularly.
- Do you know how many conversations you 20 Q
- 21 may have had?
- No idea. 22
- Do you know if she approached you
- before or after Mrs. Clinton became secretary of
- 3 state?
- I don't have any specific recollection
- as to when the conversations that I heard.
- When she first approached you, what
- was the conversation about? What did she ask you to
- 8 do?
- 9 That's ten years ago. I don't know
- 10 that I remember the verbatim conversations. You know
- 11 we had these existing -- we had an existing setup for
- 12 President Clinton's office which maintained e-mail
- 13 for his sort of close cadre staff. We at some point
- 14 had actually, following recommendation from when I
- 15 had spoken to a gentleman named Bryan Pagliano who
- 16 was the head of IT for the Clinton campaign. Both to
- 17 understand if he had any specific recommendations of
- 18 how we might upgrade the system that we were using
- 19 for President Clinton's office. And also learning
- 20 that he had surplus equipment that we could purchase
- 21 to implement a different system. That sort of in
- 22 that -- somewhere in those conversations I may have

- 1 had another conversation with Huma. I think there
- were some questions as to the robustness of the setup
- that Secretary Clinton or soon to be Secretary
- Clinton had and the number of people who were aware
- of her e-mail address and if she was going to change
- her e-mail address which certainly she could have
- done on the existing setup that she was using. But
- was there some other solution that she might use.
- 9 And somewhere in that discussion it ended up with her
- 10 coming onto the system that President Clinton's
- 11 office had setup.
- Just to be clear the existing system 12
- 13 that she had that was the black -- AT&T blackberry
- 14 e-mail account --
- 15 A Correct. O

16

14

17 That sounds correct.

-- HR15?

- When you had conversations about maybe
- 19 putting Secretary Clinton on the servers that were
- 20 already setup for President Clinton's office, was
- 21 there a discussion about what the e-mail address --
- 22 what the domain name would be for Mrs. Clinton?
- Yes. You know the -- I don't think
  - she was going to -- following the presidential
  - campaign use PresidentClinton.com as her domain.
  - And, you know, we tossed around various ideas of what
  - that could be. And, you know, in the process of
  - doing that you go online and see what's available.
  - And, you know, at that time, maybe different than
  - today, there are people who use more creative domain
  - names than others. Former late President Bush used
  - 10 something FLFW formally of the free world. So that
  - 11 makes a representation. And there was a choice
  - 12 whether you're going to use something like that or be
  - 13 sort of pretty straight forward. And however the
  - 14 discussions transpired, it was obviously the result
  - 15 that she used something that was very obviously
  - 16 related to her.

  - 17 Do you know who those -- were those
  - 18 conversations with you about the potential domain?
  - 19 Primarily between myself and Huma A 20 Abedin.
  - 21 O Do you recall who came up with
  - 22 Clintonemail.com?

16

19

#### Transcript of Justin Cooper Conducted on March 14, 2019

I don't specifically recall. As I 1 natural flow of things more than any dates certain 2 said I'm sure we searched for various availabilities 2 that that was being prepared. 3 and combinations of things and presented a list and 3 Okay. Thank you. Do you know at that 4 kicked around those names. time Secretary Clinton was thinking about using a 0 Was that what was presented to State Department e-mail account? Mrs. Clinton? A I don't recall any conversations about A I don't recall. that. Do you know if she had any input in 0 8 O Did you have any conversations with what the creation of the domain name was? 9 Huma Abedin or anyone else about using G-mail or 10 A I don't recall. 10 another more commercial server to host Secretary Did you register that domain name? 11 Q 11 Clinton's e-mail? 12 12 A I believe so. A I don't specifically recall any 13 0 Do you recall when you did so? 13 conversations like that. 14 A I believe it was in January '09. 14 Did you ever speak to Huma about 15 Do you know why --Q 15 whether or not the secretary wanted her e-mail on a 16 (Court reporter needed to plug in 16 private server? 17 computer.) **17** A I don't know -- I don't know that 18 A Repeat the question? 18 those sort of words or that phrasing would have been 19 I don't recall where I was going with Q 19 used. I think there was a general understanding that 20 that. 20 we had, for President Clinton's office, the server 21 Do you recall who created the -- how 21 setup. That was an option as to where to house an 22 many e-mail accounts were -- oh, I know what I was 22 e-mail account for Secretary Clinton. 18 20 Were any other -- during those 1 going to ask. I apologize. Do you know why the domain name was discussions, was there any discussion of other created at that time? individuals that would be housed on that same e-mail There was, you know, there was a server or same e-mail account? movement to create a new e-mail address for Secretary Well, again, President Clinton's 6 Clinton as referred to before which she could have office was already using the server. So that cadre 7 clearly had one on the AT&T system, but was looking of individuals were on the server using it. 8 for something that was a little bit more robust. And Sorry. Specifically Clintonemail.com. 9 so that was the timing around it. I mean I think 9 I don't want to get into what President Clinton's 10 there were several reasons why there was a movement 10 servers were. 11 to a new e-mail solution of sorts. A I don't know at that time -- at that 12 Sure. I was wondering a little bit 12 time I don't know what other discussions there were. 13 more specifically on the timing. 13 I know ultimately both Huma Abedin and Chelsea Was there any significance to the 14 Clinton had Clinton e-mail.com accounts. I'm not sure 15 timing of when the domain name was registered? 15 when they first came on to or requested or began You know I don't -- secretary at that 16 using that server. 17 point was preparing to take on the role of secretary 17 Would you have setup the e-mail 18 of state. So I think it was more about figuring out 18 accounts for Ms. Abedin and Chelsea Clinton? 19 19 what her e-mail solution was going to be over that Myself and Bryan Pagliano. 20 period of time. Moving away from her existing Do you know -- I started asking this 21 address many people had acquired over the period of 21 before and I don't think I followed through. 22 the campaign. So I think that was just sort of the 22 Do you know who created the HDR22

Conducted on	Conducted on March 14, 2019						
1 alias or e-mail address?	1 Q Before it was created or in the						
	1 Q Before it was created or in the 2 process of creating it.						
	3 A Primarily would have been Huma.						
	4 Q Do you recall if there was anybody						
I	5 else?						
	6 A I don't recall conversations.						
6 chosen that as an address.  7 Q Do you know if you came up with it or	7 (FD 302 A form of the FBI of						
	8 interview was marked Plaintiff's Exhibit 1						
	9 for identification, as of this date March						
<u>-</u>	10 14, 2019.)						
	11 Q I'll let you take a minute to look at						
11 do you recall when you were thinking about putting 12 Clintonemail.com or Secretary Clinton's e-mail even	12 what has been marked as Exhibit 1.						
•	13 (Witness peruses document.)						
13 before a name came up on to the Apple server, did you	14 Q Did you have a chance to look at						
14 talk to anybody besides Ms. Abedin about that?	15 Exhibit 1?						
MS. SHAPIRO: Just object to form.							
Did you introduce Apple server? Did I miss	16 A Oh, yes.  17 MR. BEKESHA: For the record,						
17 something? 18 MR. BEKESHA: That's fine. I can	18 Exhibit 1 appears to be a FD 302 A form of						
	19 the FBI of an interview that happened on						
19 clarify. Not a problem.	20 April 19th, 2016.						
20 Q I refer to Apple server. I think	21 Q Does that appear accurate?						
21 that's the same thing that you were referring to							
22 President Clinton's server, is that accurate?	22 A Yes.						
1 A Not sure. I view them both as	1 Q Let me direct your attention to the						
2 President Clinton's servers. There were two servers.	2 fourth paragraph about four lines up. This is a						
3 Maybe we can stipulate that Apple server was the	3 redacted version, so we don't know who the						
4 first server that was used, and then there was a	4 interviewee is or some of the names.						
5 subsequent server which we can call from various	5 But I want to direct your attention to						
6 documents we can refer to as the window server or the	6 the line that starts off with the redaction and says,						
7 Pagliano server.	7 blank recall the conversation with Huma Abedin and						
8 Q And just for clarification, the Apple	8 Cooper regarding the addition of Hillary Clinton to						
9 server for the relevant time period that was in	9 the Apple server; do you see that?						
10 existence for today's deposition is maybe	10 A I do.						
11 January 2009 to March 18 or so of 2009?	11 Q Do you know who that individual would						
12 A No. The Apple server was brought	12 be?						
13 online in June 2008. I believe the time you're	13 MR. SPETH: Objection. Foundation.						
14 referring to there is when Secretary Clinton had an	14 Q You may answer it.						
15 e-mail account that went through that server.	15 A I suspect it's Doug Band.						
16 Q Okay. Thank you.	16 Q The next line says, blank thought it						
17 Before January 2009 or right around	17 was a bad idea, but the issue had been decided by						
18 then when you were thinking about putting an e-mail	18 that point in time; do you see that?						
19 account or an e-mail system on the Apple server for	19 A Yes.						
20 Secretary Clinton, did you speak to anybody else	20 Q I am assuming that blank there is also						
21 about that besides Huma Abedin?	21 Doug Band?						
22 A Sorry. You said before	22 MR. SPETH: Same objection.						

25	27
1 Q Do you know if that's correct?	1 meeting our needs almost from the start to the
2 A It appears that way.	2 robustness. In a way it was successful because it
3 Q Do you recall a conversation that	3 was working in good solution, but there was a demand
4 included Doug Band about placing Hillary Clinton's	4 on it and that would have quickly exceeded the
5 e-mail on the Apple server?	5 capacity of the server, so we wanted to look for
6 A I don't specifically recall a	6 other alternatives.
7 conversation. I'll also note earlier in that	7 Q Was that because of the use by
8 paragraph talks about in 2006 and 2007, Justin Cooper	8 President Clinton's office or the use of Secretary
9 obtained a private e-mail server, the Apple server.	9 Clinton?
10 I think as we know from other facts that's well	10 MR. SPETH: Objection. Compound.
11 before the time period that actually occurred.	11 You can answer.
12 Q Okay. Do you recall Mr. Band stating	12 A The use of President Clinton's office.
13 that he thought it was a bad idea?	13 Q Thank you. I don't want to get into
14 A I don't recall that.	14 President Clinton's use of any of the servers today,
15 Q Do you know why he thought it was a	15 but I just want to make sure we delineate and
16 bad idea?	16 distinguish between issues and what was going on so
17 MR. SPETH: Objection. Foundation.	17 we don't have to get into that material.
18 A I can't speculate on that.	18 MS. SHAPIRO: Thank you.
19 Q Who is Doug Band?	19 Q We'll get into the Pagliano server in
20 A He is a colleague of mine from my time	20 a couple of moments. I just want to finish up on the
21 working for President Clinton.	21 Apple server first.
22 Q What was his did he also work for	Once everything was transferred over
26	28
1 President Clinton?	1 to the Pagliano server, what happened to the Apple
2 A Yes.	2 server?
3 Q In this January 2009 sorry 2009	3 A It was repurposed to be used basically
4 time period, what was his role with President	4 as a ordinary home computer at the Clinton residence.
5 Clinton?	5 Q Were there e-mails still on the Apple
6 A I'm not sure of his exact title, but	6 server once everything was transferred over?
7 he was a senior advisor high level staff person for	7 MR. SPETH: Objection. Foundation.
8 President Clinton.	8 Q You may answer the question.
9 Q Did he interact with Secretary Clinton	9 A I don't recall whether you know
10 at all?	10 what material was retained on that server.
11 A I'm sure from time to time, yes.	11 Q Was it wiped
12 Q Did he have any involvement with	12 A I don't know whether it was wiped.
13 helping you create the e-mail system?	13 Sorry.
14 A No.	14 Q No problem. Was it wiped clean before
15 Q Would he did he have any	15 it was transitioned into being used as a regular
16 involvement helping manage the e-mail system?	16 computer?
17 A No.	17 A I don't recall.
18 Q Thank you. When did the Apple server	18 Q If it were wiped, was that something
19 ceased to be used?	19 that you would have done?
20 A To the best of my recollection it was	20 MR. SPETH: Objection. Foundation.
21 early 2009 when we made the transition to the 22 Pagliano server. And the Apple server wasn't really	21 Q You may answer the question.
177 Eaguano server And the Annie server wasn't really	22 A Possibly. I don't know.

Conducted on	Conducted on March 14, 2019				
1 Q Do you know if that computer is still	1 conversation was with Mr. Pagliano? I mean if you				
2 being used at the Clinton residence?	2 just I'm trying to pin down dates if you can.				
3 A I have no idea.	3 A I understand. And I can't remember.				
4 Q So now let's transition to what we	4 Again it was ten years ago.				
5 referred to previously as the window's server or the	5 Q Thank you. Just you know I'm				
6 Pagliano server. I'm going to refer to it as the	6 trying to pin down if you can.				
7 Pagliano server just to let you know.	7 A Understood.				
8 When did you when was the first	8 Q Do you recall when so the at				
9 discussion or was there a discussion about	9 some point you or the Clinton's purchased new				
10 transferring over from the Apple to the Pagliano	10 equipment from Mr. Pagliano or repurposed equipment				
11 server?	11 from Mr. Pagliano to use as the server?				
12 A Sorry, what's the	12 A Yes. The same timeframe. I'm not sure				
13 Q When was the first conversation to	13 that I can be precise at all on the sequencing, but				
14 discuss the transfer?	14 once they were able to decommission the pieces, you				
15 A I can't be precise, but the Fall of	15 know, when we paid and when he reprogrammed them, I				
16 '08.	16 can't speak to the specific timeline around that.				
17 Q And whose idea was it to transfer	17 Q When was the when did the server go				
18 system or servers?	18 operational?				
19 A As I mentioned before, I don't think	19 A I believe it really didn't go				
20 we were satisfied with the performance of the system	20 operational until March of '09.				
21 that we created on the Apple server. And the	21 Q And when it went operational, what				
22 prospect of being able to add users to that end to	22 e-mail systems were placed on that server?				
30	32				
1 keep up with the changes, other changes that were	1 A Sorry, can you when say e-mail				
2 occurring in technology at the time. I think it's	2 systems, what are you referring to?				
3 hard for all of us to sort of take a time warp back	Q It was a couple of systems or accounts				
4 and remember how often we were changing devices or	4 of President Clinton's staff?				
5 how the technology which now seems fairly rudimentary	5 A Not the software.				
6 was changing. And we clearly saw that we needed a	6 Q Not the software. Just trying to				
7 proper blackberry server to accompany the system.	7 figure out I mean I guess the problem is we have a				
8 And so we were looking for ways to source that. And	8 lot of different terms going on.				
9 in some conversation I was recommended to Bryan	9 A I know. It can be very confusing.				
10 Pagliano seeing how they — to talk to him about how	10 Q Just trying to figure out				
11 they were running their e-mail system for the	11 A Things could be called by the wrong				
12 campaign. Talking to him as a resource. And in that	12 terms.				
13 - in one of those conversations - I don't know how	13 Q Yes. So thank you.				
14 many there were. I don't remember. — he made me	14 MS. SHAPIRO: Are you excluding				
15 aware they had surplus. They were going to have	15 President Clinton's staff from your				
16 surplus equipment. And could it be repurposed to	16 question?				
17 purchase from them.	MR. BEKESHA: I'm fine with him				
18 Q And I think you answered this	saying President Clinton's staff as well as				
19 previously, Ms. Abedin recommended was the one	19 the Clintonemail.com. I just want to				
20 that recommended you to speak with Mr. Pagliano?	20 A President Clinton's staff was I think				
21 A Yes.	21 the terms ported over to the new server. So their				
22 Q Do you recall when your first	22 data was moved over. Their accounts were moved over				

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33

1 to the new server and Bryan managed that process and	1 Q You may answer the question.		
2 does that answer?	2 A I don't. It doesn't surprise me.		
Q It does. Thank you. And what about	3 Q Who I assume there was a contract		
4 Clintonemail.com?	4 of some sort with Mr. Pagliano?		
5 A It was also put on the new server.	5 A I don't recall specifically a		
6 Q Do you recall who specifically did	6 contract, but there were terms that he would be, you		
7 that task?	7 know, remunerated for the time he put forth in		
8 A That would have been Bryan.	8 setting up the server and ultimately managing it.		
9 Q When it was transferred over, do you	9 Q And who would he as a contractor		
10 recall what e-mail addresses existed on the	10 and employee, who would he have been working for?		
11 Clintonemail.com system?	11 What specific entity?		
12 A I think calling it sorry, just not	12 A I don't recall what specific entity it		
13 to be rude	13 would have been. But generally this was all paid for		
14 Q Correct my terms.	14 personally by the Clintons. So then there was a		
15 A By calling it a system I think is a	15 specific entity or not that it was moved through and		
16 misnomer. On that domain maybe is the proper	16 I would have been the person who would have signed		
17 terminology.	17 off on that or made those payments. Made sure those		
18 Secretary Clinton had the account on	18 payments occurred.		
19 that domain. And I don't know when other people	19 Q And it would have been payments from		
20 specifically came online, being the other two that I	20 maybe a joint account between the two Clintons or one		
21 recall Huma and Chelsea, when they had initial	21 specific?		
22 accounts on that domain.	22 A I can't specifically recall.		
34	36  1. MS SHADIDO: Objection to relevence		
1 Q Do you know if Mr. Pagliano did you	MS. SHAPIRO: Objection to relevance.  Did you during this initial time		
2 ever talk to Mr. Pagliano, have a conversation with	2 Q Did you during this initial time 3 period, did you ever talk to Mr. Pagliano about		
3 him about the fact that Secretary Clinton was going 4 to have an e-mail account on the Pagliano server?	4 federal records retention issues?		
	5 A I don't recall any conversations.		
5 A I don't recall when the first time 6 that conversation would have occurred. Or if it was	6 Q What about any time during Secretary		
7 a proactive conversation or not, I don't recall.	7 Clinton's four terms, did you have any conversations		
8 Q Do you recall if during your	8 with Mr. Pagliano about federal records,		
9 conversations during this time period when you first	9 retention issues?		
10 spoke with him and as it was being setup, that you	10 MR. SPETH: Objection.		
11 indicated that Secretary Clinton was going to have an	11 MS. SHAPIRO: Objection.		
12 e-mail account on the server he was building?	12 A Four terms?		
13 MR. SPETH: Objection to form. Go	13 Q Sorry. Four years.		
14 ahead.	14 MR. SPETH: Objection to form.		
15 A I mean I just don't have any	15 A I don't recall any specific		
16 recollection of when that when he became aware	16 conversations.		
17 when I would have shared that.	17 Q Also let me know if you need a break.		
18 Q Would you be surprised to learn that	18 A Yeah, actually this is perfect, since		
19 Mr. Pagliano didn't know initially that Secretary	19 you're bringing it up.		
20 Clinton had an e-mail account on the server?	20 THE VIDEOGRAPHER: We're off the		
21 MR. SPETH: Objection to form.	21 record at 8:37.		
Foundation.	(Whereupon, a short break was taken.)		

	Conducted on March 14, 2019				
1		THE VIDEOGRAPHER: 8:46. On the	1	too if you are ready.	
2	reco		2	What did you mean by this these two	
3	1000	MR. BEKESHA: Great, thank you.	$\begin{vmatrix} 2 \\ 3 \end{vmatrix}$	sentences?	
	BY MR	BEKESHA:	4	A I can't precisely recall how this was	
5	Q	Mr. Cooper, again, if at any point you	5	setup at the time, but the setup would have the	
	-	eak, please let me know. We're not going to		e-mails. This is being this is the new e-mail	
		o'clock or probably anywhere close, so we	6 7	address, this is the Apple server timeframe. The	
_	_	le bit of time.		e-mails would the domain is directed to go to the	
9	A	Thanks.		Apple server. And the Apple server, to the best of	
10	Q	Also feel free to correct my		my recollection, is forwarding along the e-mails to	
	•	gy. I don't know this stuff. And so feel		secretary Clinton's Blackberry e-mail address. And	
		ucate me and maybe others in the room as			
		n't hesitate		then the next part of that would be to make her	
				Blackberry e-mail address appear as if it were	
14	A	Okay to let me know.		representative of the e-mail address on the Clinton	
15	Q	MR. BEKESHA: I'm going to introduce		e-mail system that was linked here.	
16	thia	now as Exhibit 2.	16	Q At some point did you make the	
17	uns			Clintonemail.com account active so that she could	
18		(E-mail to Secretary Clinton about		send from that e-mail account and not from the	
		o, was marked Plaintiff's Exhibit 2		Blackberry account?	
		fication, as of this date March	20		
21		2019.)	21	Q Do you recall when that was?	
22	Q	Just take a moment to look at the	22		
1 e	exhibit.	38	1	Q Once the Clintonemail.com was setup on	
2		(Witness peruses document).	2	the Apple server, what was your role with man did	
3	Q	You had a chance to review the	3	you manage the e-mail?	
	exhibit?		4	A Can you explain what you mean by	
5	A	Yes.	5	managing?	
6	Q	Could you identify just briefly what	6	Q I'm just trying to figure out what	
7 h	-	marked as Exhibit 2?	7	your role was when it came to Clintonemail.com after	
8	A	It's an e-mail from myself. Appears to		it was created?	
	e to Sec	retary Clinton regarding new e-mail setup.	9	A Once it was once an individual	
10	Q	Thank you. The first line says, your	10	account would have been created on the server, it	
	new e-ma	il address has been created.		really wasn't much to manage. The user was had	
12		Do you recall when specifically this		connectivity. Short of a problem with that	
	was?			connectivity was on their own.	
14	A	I don't specifically recall.	14	•	
15	Q	The next line is, you'll receive mail		Clinton's e-mail account?	
	•	Berry that is sent to this address.	16		
17	<b>J</b> . –	Is this just you letting her know that	17		
	ın e-mail	address has been setup and she'll start	18	Q Do you recall when you created Huma	
	eceiving	-		Abedin's e-mail account?	
20	A	Yes.	20		
21	Q	The next line is, right now you cannot	21	Q Do you recall time period if it was	
	_	this address. I can make that active now		January or February or March or April of 2009?	
				NEDOG	

Conducted on March 14, 2019					
41	43				
1 A I really don't recall.	1 (Witness peruses document.)				
2 Q Thank you.	2 Q You had a chance to review Exhibit 3?				
Were there ever connectivity issues	3 A Yes.				
4 with Clintonemail.com and the e-mail accounts	4 Q Could you identify what Exhibit 3 is?				
5 associated with that domain name?	5 What it appears to be?				
6 A Yeah. I think there were over a	6 A An exchange of e-mails between myself				
7 period of time that both servers were in place there	7 and Secretary Clinton.				
8 were connectivity issues due to a wide variety of	8 Q That's for on September 6, 2009?				
9 causes.	9 A Yes.				
10 Q And how would you learn if there were	10 Q Great. Thank you.				
11 problems?	11 Going to the first e-mail of the chain				
12 A I think just as any of us would learn	12 to the bottom one from H. H is Secretary Clinton?				
13 that there's a problem. In many cases something is	13 A Correct.				
14 not working. You're not getting your e-mail. You're	14 Q And this e-mail seemed to I guess				
15 not connected sometimes. The connectivity issues	15 do you know what she is referring to in that first				
16 were tied to the service provider AT&T or Verizon or	16 e-mail where she says, message from last night, did				
17 whomever your device may be connected to. Sometimes	17 you receive it?				
18 once we were on the Pagliano server, we were on the	18 A I have no idea.				
19 full Blackberry infrastructure which has its own	19 Q And your response to her appears to be				
20 components, sort of out in the ether that could fail	20 just explaining what maybe the issue was?				
21 and lack activity. Then there could have been	21 A Correct.				
22 something with the connectivity to the servers	22 Q Thank you.				
42	44				
1 themselves that could have caused a disruption.	1 MR. BEKESHA: Mark this as Exhibit 4.				
2 Q And with Secretary Clinton's e-mail	2 (E-mail chain between witness and				
3 account, did she ever have any problems connecting or	3 Secretary Clinton from August 30th and				
4 sending or receiving e-mail accounts while her e-mail	4 August 31, 2011 was marked Plaintiff's				
5 was on the we'll just focus on the Pagliano server	5 Exhibit 4 for identification, as of this				
6 now?	6 date March 14, 2019.)				
7 A I don't specifically recall, but I'm	7 (Witness peruses document.)				
8 sure that there were instances where she had	8 Q Had you a chance to look over				
9 connectivity issues.	9 Exhibit 4?				
10 Q How would you find out about those	10 A Yes.				
11 issues?	11 Q And Exhibit 4 appears to be an e-mail				
12 A Someone else would usually alert me or	12 chain between you and Secretary Clinton from				
13 she would reach out in some cases which were maybe	13 August 30th and August 31, 2011?				
14 perceived connectivity issues.	14 A Appears that way, yes.				
MR. BEKESHA: Why don't we just go	15 Q What is H pad?				
through a series of e-mails now. I'll	16 A H pad was a reference to Secretary's				
introduce them each separately to make it	17 iPad.				
easier on everybody. But we'll go through	18 Q Did you setup an iPad for Secretary				
them quickly. Mark this as Exhibit 3.	19 Clinton?				
20 (E-mail was marked Plaintiff's	20 A I don't recall setting up an iPad for				
21 Exhibit 3 for identification, as of this	21 her.				
22 date March 14, 2019.)	22 Q Do you know who did?				

		Conducted on	iviai	W1 V11 1 1, 2 V 13
1		No, I don't recall.	1 .	47
1	A	Do you know when it was setup?		routed to, I guess, Google infrastructure account
2	Q <b>A</b>	I don't recall.		versus a Blackberry?  MR. SPETH: Objection to form.
3	A Q	It seems the original e-mail is	3	
4	_	_	4	•
5		y blank. So I just want to go to your	5	ž
6	response.	It says I set years a mail. The	6	•
7		It says, I got your e-mail. The	7	
8	•	the iPad is dag. Is that a typo or does	8	•
9		something?	9	
10		I believe that's a typo.		0 there's discussions of several individuals that when
11	-	Do you know what it was supposed to		1 there were issues with the Blackberry with
	be?	Y 11 14 1 4X1 P		2 Secretary Clinton's Blackberry, that there was a
13		I could speculate, but I believe		3 separate G-mail account setup that was used for her
	probably			4 to communicate or have e-mails.
15	-	Do you know it says it then	15	: : :
		though I can setup e-mail on there if		6 setup that account for her?
	•	Your HDR22Clintonemail.com is backup on	17	
	-	server and should be delivering to your		8 up, but the reference I don't know that it's fair
	Blackberry			9 to say there was a G-mail account setup for her that
20		Do you know what e-mail you were		0 I'm aware of. There was the ability to route the
		a could setup to the iPad?		1 server through G-mail infrastructure using her e-mail
22	A	I don't remember specifically the	22	2 address, so that she would still receive messages.
1	seguencin	g here. Looking at the date, this was	1	Q Okay. So there wasn't a separate and
2	_	e of the major storms on the east coast. I		
3	_	was Irene. And so there were some outage.	3	
4		ecretary was using her iPad to communicate.	4	
5		k I'm just saying here that her Blackberry		
6		and running.		
7	_	Were you going to setup the	7	
T'		intonemail.com on the iPad or a different	8	8
9	_	ount at that time?	9	
10		don't recall.		0 years her e-mail address had to be routed through the
11		IS. SHAPIRO: Objection to form.		1 G-mail infrastructure?
12		don't recall what that, you know	12	
		erence is true.	13	·
14		Did you ever create a G-mail account		4 you set that up?
		ary Clinton?	15	· ·
16		don't recall specifically creating a		6 managed that, but I was a part of the discussions
		count for her. There was a point in time		7 around implementing that.
		at time when we used the Google mail	18	
	_	ture as a backup. I don't recall creating		9 those discussions?
		address for her.	20	
21		So if there were issues with her	21	• •
	•	to other outages, did some e-mails were	22	
	1			

Conducted on March 14, 2019				
1 Q Huma Abedin?	1 A It was generally Huma Abedin and			
2 A May have been aware of the ultimate 3 result.	·			
4 Q So if there were issues with	<ul><li>Q Who's Monica Hanley?</li><li>A An aide to Secretary Clinton.</li></ul>			
5 connectivity at times, were you the first point of	A An aide to Secretary Clinton.  You don't know what her title was?			
6 contact if Secretary Clinton was having issues?	6 A I do not.			
7 A I can't speak to whether that's the	7 Q She was at the State Department?			
8 case, but usually I was maybe the ultimate point of	8 A I believe so.			
9 contact.	9 Q Thank you. Did Secretary Clinton use			
10 Q Maybe it came through would you	10 more than one Blackberry during the four years? Did			
11 hear from Huma Abedin?	11 she get Blackberries replaced?			
12 A Possibly.	12 A Yes. She fairly regularly had			
13 Q Was there anyone else on Secretary	13 Blackberries replaced.			
14 Clinton's staff that you may have heard from if she	14 Q And would you help her with that			
15 was having issues with her e-mail?	15 replacement process?			
16 A It's possible that it came from	16 A Sometimes.			
17 others.	17 Q What would that mean? What would you			
18 Q When there were issues, did you help	18 do?			
19 to try to fix those or was somebody else somebody	19 A It would have to be a new Blackberry.			
20 else responsible to for trying to fix the issues?	20 Her data she liked to make sure to preserve her			
21 A I think it was a circumstance by	21 data. So the data would be backed up usually to a			
22 circumstance consideration.	22 desktop computer by accessing the server. One time			
50	52			
1 Q What do you mean by that, if you could	1 password setup to activate the Blackberry. The			
2 elaborate?	2 Blackberry the new Blackberry someone puts a sim			
3 A Your questions are vague in terms of	3 card into it. Types in that one-time password. And			
4 what the problem was. So depending on what the	4 it activates, communicates with the server and brings			
5 problem was or my availability, I may have reached	5 down information. And the other files that it			
6 out to someone else to solve it. It may have been	6 doesn't bring down, get moved back on from the			
7 something as simple as pulling out a battery and	7 desktop computer.			
8 restarting a device. It may have been a more complex	8 Q Where was this desktop computer			
9 problem. So it's hard to say what the tasks were	9 located?			
10 that were followed up on.	10 A It varied depending on who was			
11 Q Who else would you reach out to say	11 assisting in the process.			
12 you weren't available?	12 Q What do you mean by that?			
13 A Again Bryan Pagliano was the other	13 A If she was replacing her Blackberry in			
14 person that had access to the server could if it	14 Washington DC, it may have been someone helping her			
15 was server related where he diagnosed something from	15 to do this from her home in Washington DC. If I was			
16 the server.	16 with her in New York, I may have helped her in New			
17 Q Was there anyone else that you recall?	17 York to do it. It varied from, to best of my			
18 A Not particularly. The secretary may	18 recollection, from time to time.			
19 have had some aide along her side that was helping to	19 Q And what info or data was transferred			
20 implement whatever solution it may have been.	20 to the desktop computer during this process?			
Q Do you recall who her aides were	21 MS. SHAPIRO: Object to form.			
22 during that period of time?	22 Q You may answer.			

_	Conducted on March 14, 2019				
1	A	The there's a program, Blackberry	1	that Bryan Pagliano oversaw that functionality.	
1		program. I'm not sure if that's the exact	2	Q So you weren't responsible for any of	
3		That allows you to chose which files can come	$\begin{vmatrix} 2 \\ 3 \end{vmatrix}$	the backup or backup of the server?	
4		typically people use a complete backup of	4	MR. SPETH: Object to form.	
5		You could select things in and out.	5	A No.	
	Q	Would that include e-mails?	6	Q Did you know that Bryan Pagliano	
6 7	A	Could include e-mails.	7	worked for the State Department?	
ľ	Q	And once the new Blackberry was up and	8	A Yes.	
8		what happened to that data that was on the	9	Q Do you know when he started at the	
		computers?	1-	State Department?	
11	A	I can't say in any specific instance	11		
		ppened to them.		2 started. I know it was after the server was	
	-	Did you ever use one of your personal		3 initially setup.	
13	-	• •	14	* *	
		f your own desktop computers to do this?		5 employee, was he still under contract with the	
15		Yes.		6 Clintons to help manage backup, do whatever he was	
16	•	Do you still have e-mails of Secretary		doing with the Pagliano server?	
		on those computers?  No.	18		
18				•	
19	_	Did you turn those computers over to	19 20		
		at any point?		3	
21	A	Yes, I did.	21	8	
22	Q	Do you know if they recovered any  54	22	2 phraseology for it. I think he was quote/unquote	
1	e-mails o	off of those computers?	1	under contract. But he would from time to time	
2	A	I can't speak to what they recovered.	2	monitor, update, perform service on the server and he	
3	Q	Was secretary Clinton's e-mails backed	3	was compensated for the time that he took to do that.	
4	up once	it was on the Pagliano server?	4	Q I know when you had testified before	
5	-	MR. SPETH: Object to form.	5	Congress there was a lot of interest about brute	
6	$\mathbf{A}$	The Pagliano server had a backup	6	force attacks against the Pagliano server. I'm not	
7	device.	•	7	interested in those attacks and arguing about what	
8	Q	And what would that device backup	8	you meant by that and not. I know Congress seemed to	
9	would it	backup e-mails?	9	enjoy that a lot. But I was interested a little bit	
10	$\mathbf{A}$	Backup I believe the entire server.	10	) in your communications with the secret service.	
11		Which may include e-mails?	11	How many times did you contact the	
12	$\mathbf{A}$	Would include e-mails.	12	2 secret service about the Pagliano server and these	
13	Q	Thank you. I don't know how backup		s issues?	
14	devices	work. So just trying to	14	MS. SHAPIRO: So I'm just going to	
15	A	No, no.	15	object to relevance. What prong of the	
16		clarify.	16	permitted discovery is this germane to?	
17	-	Do you know how often that server	17		
18	backed i		18		
19		I don't recall.	19		
20		Do you know if it was once a day, once	20	about the information and whether or not it	
21	a week o	or once a year?	21	was related to other government agencies.	
22	$\mathbf{A}$	I don't recall. That was something	22	MS. SHAPIRO: Okay. Go ahead. I	

Conducted on	March 14, 2019
57	59
object, because I don't see that connection,	1 A This looks appears to be in the
but go ahead and ask him.	2 same period of one of the storms where as we
A Can you repeat it?	3 discussed earlier there may have been a rerouting of
4 Q I'm just wondering how many times did	4 the domain through the Google infrastructure. And in
5 you talk to the secret contact the secret service	5 returning it to our native infrastructure, it looked
6 when you had an issue?	6 like there was a need to clear out some settings to
7 A Yeah. I vaguely remember one or two	7 make sure that is happening.
8 times.	8 Q Great. And who is John Davidson?
9 Q When you reached out to the secret	9 A He is an aide to President Clinton.
10 service, did they know that Secretary Clinton had an	10 Q Do you know what his title was?
11 e-mail account on the server?	11 A I don't know what his title was, I'm
MR. SPETH: Objection to foundation.	12 sorry.
13 A I don't recall.	13 Q Were there titles?
14 Q Do you know if you informed the secret	14 A (No response.)
15 service at any time of that?	15 Q What was his role in all of this? How
16 A I don't recall whether I did or	16 does he fit into Secretary Clinton's e-mail?
17 didn't.	17 A I suspect he was just in close
18 Q Okay. Thank you.	18 proximity to her at the time.
MR. BEKESHA: Just take a quick two	19 Q Do you recall other instances where he
20 minute break.	20 may have been involved in helping out on issues?
THE VIDEOGRAPHER: We're off the	21 A Not specifically.
22 record at 9:09.	22 Q Do you know if he was involved in
58	60
(Whereupon, a short break was taken.)	1 creating the e-mail account at all?
2 THE VIDEOGRAPHER: Back on the record	2 A No.
at 9:14.	Q Or in discussions about creating an
4 MR. BEKESHA: Great. Thank you.	4 e-mail account?
5 Let's mark this as Exhibit 5.	5 A No.
6 (E-mail between witness, John	6 Q So he was more just a one off person
7 Davidson, Bryan Pagliano trying to resolve	7 that may have been in proximity at that time?
8 an issue related to Secretary Clinton's	8 A Correct.
9 Blackberry was marked Plaintiff's Exhibit 5	9 MR. BEKESHA: We're done with that
10 for identification, as of this date March	10 exhibit.
11 14, 2019.)	11 (E-mail from the witness to Secretary
(Witness peruses document.)	12 Clinton on September 25th, 2009 was marked
13 Q Did you have a chance to review the	13 Plaintiff's Exhibit 6 for identification, as
14 document?	of this date March 14, 2019.)
15 A Yes.	Defore we get to Exhibit 6. Let me
16 Q Could you identify for the record what	16 just followup on one quick question about the Google
17 has been marked as Exhibit 5?	17 infrastructure. Was that something that was always
18 A Appears to be an e-mail between	18 in place? I guess I don't really understand what it
19 myself, John Davidson, Bryan Pagliano trying to	19 is and how it works. Did it store e-mails there?
20 resolve an issue related to Secretary Clinton's	20 Was it something that somebody could always go to the
21 Blackberry.	21 Google account and access e-mail at any point or was
Q Do you know what that issue was?	22 it something that was turned on and turned off when

61 63 needed? 1 had a truncated message, you have to click more, more 2 MS. SHAPIRO: Objection to form. 2 for all the rest of the message to load in. Because 3 MR. SPETH: Same objection. all of the e-mails are on the server. So you're just A I can't specifically recall at the 4 having to send a message from the device back to the 5 time how exactly this was setup. But Google offers server to say send me the rest of this message. 6 the ability to route the domain through their Okay. So every time or in this 7 infrastructure and then, you know, you could have -instance when Secretary Clinton got a new Blackberry, 8 very much like the Apple server, there's a did all of her e-mails transfer from the server to 9 possibility of bouncing into the underlying 9 the new Blackberry? 10 Blackberry e-mail address or something as a quick get 10 MR. SPETH: Object to form. 11 around. I can't speak to whether anything was stored 11 A I can't say that all of her e-mails 12 in boxes on it at that time. 12 came down. To the best of my recollection, in 13 13 generally working with these devices, you don't -- if Was there ever a discussion to 14 permanently stay on the Google infrastructure? 14 you had ten years of e-mails, they're not all going 15 Not that I recall. 15 to load onto your Blackberry. They probably won't Now turning your attention to what has 16 fit onto your Blackberry. Blackberry sends down from 16 O 17 been marked as Exhibit 6. 17 the server some group of active e-mails or recent 18 Have you had an opportunity to review 18 e-mails. I don't know how to qualify it. It's not my 19 it? 19 expertise. But the e-mails are all still resolving 20 20 or remaining on the server. I have not. 21 21 And during that time it would have (Witness peruses document.) 22 22 been for the most the --62 64 0 And Exhibit 6 appears to be an e-mail A The Pagliano server. 1 from you to Secretary Clinton on September 25th, 2 0 The Pagliano. 2009? 3 For sure the Pagliano server. Α 4 A Correct. 4 Q Were e-mails stored at any point on 5 In this it talks about your new Berry the Apple server or was that -is set. At this time did Secretary Clinton get a new 6 I don't recall. Blackberry? MR. BEKESHA: Mark this as Exhibit 7. A I believe that's what it's indicated (Two e-mails between witness and 8 here. 9 Secretary Clinton dated September 29, 2009 10 Three lines down, messages from your 10 was marked Plaintiff's Exhibit 7 for 11 identification, as of this date March 14, 11 old Berry are there, but to read the text when you 12 open a message. What does that mean? 12 2019.) 13 When a new Blackberry connects to the (Witness peruses document.) 14 Blackberry enterprise server, information is brought 14 Q Had you a chance to review Exhibit 7? 15 from the server onto the Blackberry. Most A 15 Yes. 16 information there's always some settings or some 16 0 And Exhibit 7 appears to be an e-mail 17 lingering things that for some reason don't transfer 17 chain between you or two e-mails between you and 18 Secretary Clinton dated September 29, 2009? 18 over. So we usually had a two-step process which was 19 19 to let the Blackberry enterprise server populate the A Correct. 20 new device, and then bring over a select or complete 20 O Great. In the message, you state 21 they're all backed up on the server. The easiest and 21 information from the previous device. So here what 22 this is saying is if the message is -- if you ever 22 quickest way is to log on to the web mail server.

Conducted	511 1/1d1011 1 1, 2019
Do you know if Secretary Clinton ever	1 A That's my understanding.
2 used the web mail server?	2 (E-mails regarding Secretary's
3 A I don't recall.	3 Blackberry failing, was marked Plaintiff's
4 Q Did you ever walk her through the	4 Exhibit 9 for identification, as of this
5 process?	5 date March 14, 2019.)
	6 (Witness peruses document).
6 A I don't recall if I did or didn't. 7 Q Do you know if anybody accessed	
8 Secretary Clinton's e-mails through the web mail 9 server?	
	9 Q Could you just identify Exhibit 9 for 10 the record?
1 -	
11 Q Also in this e-mail you say, your old	11 A Series of e-mails regarding
12 Berry has messages backed to August 29, 2009, and	12 Secretary's Blackberry failing or not working
13 then only saved messages prior to that.	13 including Huma Abedin and Monica Hanley in a chain of
So that's what we were just talking	14 e-mails.
15 about before that the berry the Blackberry only	15 Q Thank you.
16 maintains more recent or some e-mails?	16 Who is Monica Hanley?
17 A Right. Correct.	17 A She's an aide to Secretary Clinton.
18 Q But everything was still contained on	18 Q Do you know when you communicated her
19 the Pagliano server?	19 with her what e-mail address you used for her?
20 A Correct.	20 A I don't recall.
21 MR. BEKESHA: Introduce this as	21 Q Part of the e-mail address is redacted
Exhibit 8.	22 here. Do you know if that is a personal e-mail
66	68
1 (Two e-mails between witness and	1 account or State Department e-mail account?
2 Secretary Clinton on June 6, 2011 was marked	2 A I don't know.
3 Plaintiff's Exhibit 8 for identification, as	3 Q Did Monica Hanley have an e-mail
4 of this date March 14, 2019.)	4 address on Clintonemail.com?
5 (Witness peruses document).	5 A I don't recall if she did.
6 Q Could you just identify Exhibit 8 for	6 Q And again, just for the record, I know
7 the record please?	7 this is getting tedious and I apologize, but for the
8 A It's two e-mails between myself and	8 second e-mail in the chain it says, all of your info
9 Secretary Clinton on June 6, 2011.	9 is on the server, which you can access on any web
Q And again this appears to be an e-mail	10 enabled I assume that's device or something there.
11 exchange regarding getting Secretary Clinton a new	11 But that's the Pagliano server?
12 Blackberry?	12 A Correct.
13 A Correct.	MR. BEKESHA: And just hand out one
14 Q And again I just want to emphasize so	more e-mail in this grouping.
15 we're all clear, one of your lines is all of your	15 (E-mail chain between you Huma Abedin
16 older messages will remain on the server?	16 and Monica Hanley was marked Plaintiff's
17 A Correct.	17 Exhibit 10 for identification, as of this
18 Q That's the Pagliano server?	18 date March 14, 2019.)
19 A Correct.	19 (Witness peruses document.)
20 Q It's your understanding that	20 Q Have you had an opportunity to look at
21 throughout the four years of her tenure, all e-mails	21 it?
22 were maintained on the Pagliano server?	22 A Ves

Conducted on March 11, 2017				
1 Q And just for the record, Exhibit 10	1 myself, Bryan Pagliano and some of Secretary			
2 appears to be an e-mail chain between you, Huma	2 Clinton Oscar Flores relating to looks like			
3 Abedin, Monica Hanley, and at the beginning Secretary	3 secretary having some trouble with her Blackberry.			
4 Clinton around January 20th and January 21st, 2012?	4 Q And who is Oscar Flores?			
5 A Yes.	5 A Oscar Flores is the Clinton's house			
6 Q Looking at the second e-mail on the	6 manager in Chappaqua.			
7 first page, the e-mail from Huma to you and Monica it	7 Q What does that mean?			
8 says, Huma writes, she wants us to print her pictures	8 A He's their household staff person.			
9 and memos before we switch Berries so she can be sure	9 Q What was his role in Clintonemail.com			
10 she has them. She also told me she wants to get	10 domain name and e-mail address on it?			
11 everything on the new Berry especially her saved	11 MR. SPETH: Object to form.			
12 e-mails.	12 MS. SHAPIRO: Object to form.			
Do you know what memos the e-mail is	13 A I don't believe he had any, you know,			
14 referring to?	14 specific role in the involvement of this. He may			
15 A I would assume pictures and memos.	15 have been a user on the system. I believe he was the			
16 Memos is an app on the Blackberry. So I'm not sure	16 user on the system. Generally knew how to use the			
17 that that's anything more than notes she may have	,			
, a	17 Blackberry.			
18 kept in that app. To be fair to speculate on that, I	18 Q And by the system, you mean the			
19 don't believe that refers to I can't really speak	19 Pagliano server?			
20 to if that refers to something more complicated than	20 A Server. I'm Sorry.			
21 that. My inclination here is memos being the	21 Q So not Clintonemail.com e-mail			
22 notes that are kept in the memo pad app on the phone.	22 account?			
1 Q Do you know if those memos were	72 1 A Correct.			
2 transferred from one Blackberry to another? By	2 Q To the best of your knowledge?			
3 memos, I mean the notes in the memos app?	3 A To the best of my knowledge, he had			
4 A I think there was obviously – by	4 presidentclinton.com e-mail.			
5 reading this there was a conscious effort to make	5 Q Would he help secretary Clinton if			
	6 problems came up with her e-mail account?			
6 sure that was happening here. 7 Q Do you know if those notes or the	7 A Sure. From time to time.			
	9 if she was			
10 A I don't know. I don't recall.	10 A Proximity?			
11 (E-mails between myself, Bryan	11 Q proximity?			
12 Pagliano, Secretary Clinton and Flores was	MR. SPETH: Object to form.			
13 marked Plaintiff's Exhibit 11 for	13 A I would say proximity is accurate.			
14 identification, as of this date March 14,	14 Q I guess one, two other questions from			
15 2019.)	15 this.			
(Witness peruses document).	Bryan Pagliano in the last e-mail			
17 Q Did you have an opportunity to review	17 says, we need to put in policies for iPhone and iPad			
18 the exhibit?	18 use like password expiration and complex			
19 A Yes.	19 requirements. Do you know what he meant by that?			
20 Q Could you just briefly identify the	20 A Over the course of a lifetime of the			
21 exhibit for the record?	21 server, Bryan was consistently recommending new			
22 A It's a series of e-mails between	22 policies that would keep us even more secure. And as			
DI ANIE	r Drnog			

75 1 the technology itself was evolving, providing new 1 reports, I know that my e-mail account was 2 opportunities to do that. When we started off with transferred at some point. I believe it was called 3 the server there were no users on iPhones and iPads. PRN. 4 And I think as you get to this timeframe in 2012 Q Plat River Networks I believe? 5 those devices start to become more ubiquitous, and I A I believe that's correct. 6 can't recall who or how many users would have been Q Did you have any role whatsoever 7 using those devices, but certainly we would have during that transition process? 8 wanted those sorts of policies if people were 8 You know I turned over my credentials 9 starting to use those devices on the system. 9 for the servers so that it could be accessed by -- in 10 Was this more of a concern because 10 the transition, but, I believe, that's the extent of 11 Secretary Clinton was using the server and these 11 my participation in the process. 12 systems for her e-mail usage? Did you -- do you know if Monica 13 13 Hanley at some point archived e-mails during this I don't know if it was more or less 14 specific to her. Just the general protection of the 14 time period? 15 system as a whole on all the users. 15 MR. SPETH: Object to form and At some point was the Pagliano server 16 foundation. 17 stopped being used? That was a really poorly worded 17 MS. SHAPIRO: Objection. 18 question. 18 Q I'll just be more specific. Of 19 19 Secretary Clinton's e-mails? A Rephrase please. 20 Q 20 There was -- I don't know if it was Absolutely. 21 Sometimes it just comes out and you 21 related to that transition. There was a point when 22 think what. 22 Monica Hanley was trying to create an offline archive 74 76 Was there an end date when the 1 of Secretary Clinton's e-mails. 2 Clintons stopped using the Pagliano server to have Do you know when that was taking 3 their e-mail on it? 3 place? There was. I don't know the specific I can't be precise. I believe it was date, but there was. the Spring of 2013, but I'm not sure that that's 6 accurate. Do you know approximate dates? Α I believe it was approximately the 0 Do you know if Secretary Clinton was summer of 2013. still in office when Monica -- when Ms. Hanley was --9 And why was the server -- why did they If that was that correct time, she O 10 transition away from the Pagliano server? 10 would have been in office. I can't really speak to the reasons 11 0 Did you help her with that process? 12 why that was occurring. I really wasn't very much a 12 A Yes, to some extent. 13 part of that process. I was transitioning out of 13 O What do you know mean by that? 14 many of my roles with President Clinton at that time, 14 A I mean I walked her through over the 15 and I didn't take on the duty of trying to figure out 15 phone that process and we had supplied a computer 16 what the next incarnation that this was going to be. 16 from President Clinton's office for her to use to try Were you involved in any early 17 to achieve that. 18 discussions about what would be next? 18 Q And do you know if she was successful? 19 19 Not particularly that I recall. A A I do not. Do you know where the e-mail was O Do you know what if anything was 0 21 transitioned to after the Pagliano server? 21 transferred onto that computer? I understand, from reading news 22 22 I do not.

	,
1 Q Do you know what happened to the	1 discussions with her about that.
2 Pagliano server after it was done being used.	2 Q Why do you believe that or how do you
3 A I do not. I certainly read news	3 know that?
4 reports that had different things, but I had no	4 A Limited universe of people that would
5 personal knowledge of what happened to the server.	5 have that discussion.
6 Q Did you ever talk to Mr. Pagliano	6 Q I briefly touched on the brute force
7 about what happened to that server?	7 attacks.
8 A No.	8 Did Secretary Clinton know those were
9 Q Are you in possession of any of	9 taking place when they were?
10 Secretary Clinton's e-mails?	10 MS. SHAPIRO: Object to form.
11 A No.	Objection to relevance.
12 Q Have you turned strike that.	12 MR. SPETH: Objection to form.
13 Did you turnover any e-mails of	13 Q Did you speak to Secretary Clinton
14 Secretary Clinton to the FBI?	14 about those issues?
15 A Yes. I turned over those materials to	15 A I don't recall speaking to her about
16 the FBI.	16 those issues.
17 Q Did they return those to you?	17 Q At any point during her four years,
18 A They did not.	18 did you ever talk to Secretary Clinton about
19 Q Prior to turning material over to the	19 transitioning to another e-mail account or system?
20 FBI, did you delete any Secretary any Secretary	20 MS. SHAPIRO: Objection to form.
21 e-mails of Secretary Clinton that you had saved on	21 MR. SPETH: Objection to form as to
22 any of your computers?	22 account or system.
78	80
1 A No.	1 Q You can answer.
2 Q So we've talked a lot about a lot of	2 A I'm actually not sure what you're
3 different issues today. I just have a couple of	3 asking.
4 questions that I didn't follow through on. We talked	4 Q Sure. I guess the question is, at some
5 about the creation of the system.	5 point she transitioned from the Blackberry to AT&T to
6 Was Secretary Clinton a part of any	6 the system that was on the Pagliano server.
7 those discussions?	7 Was there any discussions with her to
8 MR. SPETH: Objection to form.	8 move her e-mail account to something that wasn't the
9 MS. SHAPIRO: Objection to form.	9 Pagliano server?
10 Vague.	10 A Not that I was a part of.
11 MR. SPETH: Vague as to system.	11 Q Did you have any conversations with
MR. BEKESHA: I can rephrase.	12 anyone else about changing her e-mail account or
13 Q Did Secretary did you have any	13 moving it away from the Pagliano server during the
14 conversations with Secretary Clinton about the	14 four years?
15 creation of the domain name Clintonemail.com?	15 A Not that I recall.
16 A I don't recall specifically whether I	16 Q Do you believe that Secretary Clinton
17 had a conversation with her on that or that was	17 should have used the State Department e-mail account?
18 relayed to me through others.	18 A That's not for me to opine on.
19 Q Do you know if anybody else had	19 Q Do you know did you know that she
20 conversations with Secretary Clinton about the	20 was using her Clintonemail.com e-mail account to
21 creation of the domain name Clintonemail.com?	21 conduct State Department business?
22 A I believe Huma Abedin had some	22 A I'm not sure that that's something

83 1 that I knew or could determine. 1 a flip phone while she was secretary of state? Were you concerned at all about record 2 I don't recall when she stopped or 3 retention related to Secretary Clinton's work related 3 started using the flip phone. e-mail accounts or work related e-mails? 4 Do you know if she continues to use a MS. SHAPIRO: Objection. That's 5 flip phone to this day? 6 outside the scope of the deposition. I do not know. A You may answer the question. O Do you know if she would at times Q carry a flip phone, Blackberry and iPad while she was 8 Could you repeat the question again? A 9 secretary of state? 9 O Yeah. Did you have any concerns about 10 record retention issues as it related to Secretary 10 A I can't say. 11 Clinton's work related e-mails? Did you ever see her carrying a 11 Q 12 Blackberry and iPad at the same time? 12 I viewed her usage as this was her 13 personal e-mail account. Wasn't really focused on I'm not sure I ever recall seeing her 13 14 what the content of her e-mail was or to the extent 14 carry an iPad. 15 she was using it, as you're suggesting for work 15 Q But she had one that she used 16 purposes. 16 occasionally? 17 Q Did you ever see Secretary Clinton use **17** A 18 or carry more than one device at a time? Do you know who Cheryl Mills is? 18 0 19 19 A Yes. A Yes. 20 Q What other devices would she use? 20 Q Who is she? 21 I recall her at least in the earlier 21 A She is a long time associate of the 22 days using a flip phone. 22 Clintons. Attorney for them. Secretary Clinton's 82 84 Do you recall what that time period --1 chief of staff. Friend of mine. 0 the earlier days would be? Did you have any conversations with 3 MS. SHAPIRO: I didn't hear you say Cheryl Mills about the Clintonemail.com domain name during the relevant period of end of 2008, early 2009 4 what phone? 5 and Secretary Clinton leaving office? THE WITNESS: A flip phone. MS. SHAPIRO: Flip phone. Sorry. MS. SHAPIRO: Objection to form. 6 6 7 I don't know that I can specify to Α 8 Do you know if she used a flip phone 8 dates, but at some point I had a conversation with 0 while she was secretary of state? 9 Cheryl Mills about the general setup of the system. 10 MR. SPETH: Let's go off for a minute. 10 She asked if I could give her a brief description of THE VIDEOGRAPHER: We're off at 9:46. 11 11 the setup of the system. 12 (Whereupon, a short break was taken 12 Do you recall if Secretary Clinton was 13 to stop the noise of construction going on 13 still -- was secretary of state at that time? in the next room.) I don't recall that timing of. 14 14 A 15 THE VIDEOGRAPHER: This begins disk 15 Do you know if it was earlier, later? 0 number 2 in the deposition of Justin Cooper. 16 I mean any type of timing. I know it's tough. It's 16 17 We're on the record at 9:52. 17 been a couple of years. MR. BEKESHA: Great. 18 18 I really don't recall. What are the A And I think we had an open question 19 timeframes again? 20 before all the banging started. So I'll just go back 20 I guess I'm wondering if it was either 21 to that. 21 before she was secretary of state, while she was 22 Do you know if Secretary Clinton used 22 secretary of state or post being secretary of state.

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A So I can answer that. I had a 1 it says that then Senator Clinton said in 2001, as				
2 conversation with Ms. Mills regarding just the quick	2 much as I've ever been investigated and all of that,			
3 explanation of the set up of the server. After she	3 you know, why would I I don't even want why			
4 was secretary of state I think when the first public	4 would I ever want to do e-mail? And then can you			
5 stories appeared about the server.	5 imagine? Do you see that?			
6 Q And do you recall any conversation	6 A Yes.			
7 about the server or the domain name prior to that	7 Q Were you working for the Clintons in			
8 conversation?	8 2001?			
9 A I don't recall any.	9 A I'm sorry. I'm not clear you added			
10 Q A little bit earlier you mentioned	10 some words in			
11 that there was a limited universe of individuals that	11 Q The next paragraph says, can			
12 would have types of conversations with Secretary	12 you imagine.			
13 Clinton. You mentioned Huma Abedin was one of those	13 A You added words in the beginning. You			
14 people.	14 said then Secretary Clinton. I'm just not — I'm			
Were there any other individuals that	15 confused as to what timeframe this paragraph is			
16 you would consider a part of a limited universe?	16 referring to.			
17 MR. SPETH: Objection to form.	17 Q Okay. In the paragraph before the			
18 Vague.	18 article talks about footage from a 2001 report			
19 A I don't know if I can answer that.	19 talking about this discussion.			
20 Relation to	20 A Right.			
21 Q Relation to the topics we're talking	21 Q And so I guess my question is, were			
22 about today.	22 you working for the Clintons between 2000, 2001?			
86	88			
1 MR. SPETH: Same objection.	1 A Yes. Sorry, is the underlining			
2 MS. SHAPIRO: Objection to form.	2 section here not a part of the story? Is that like			
3 A I can't really say who she spoke to	3 an insert link?			
4 about this.	4 Q I think it could be.			
5 (ABC News article written by a Marcio	5 A Did I read that correctly?			
6 Jose Sanchez entitled Coming up Hillary	6 Q I think so. Trying to print things			
7 Clinton in 2000 was marked Plaintiff's	7 can be a little bit of a challenge. So I apologize.			
8 Exhibit 12 for identification, as of this	8 A So you're reading this is going from			
9 date March 14, 2019.)	9 paper trail to as much.			
10 (Witness peruses document.)	10 Q Yes.			
11 Q Had a chance to read?	Have you ever heard this quote before?			
12 A Yes.	12 A No.			
MR. BEKESHA: For identification	Q We're done with that exhibit.			
purposes, Exhibit 12 appears to be an ABC	14 A few last questions, then we'll take			
News article written by a Marcio Jose	15 another short break and then we'll wrap it up.			
16 Sanchez entitled Coming up Hillary Clinton	Besides counsel, have you spoken to			
in 2000. Why would I have ever wanted to do	17 anyone today about your testimony?			
18 e-mail.	18 MR. SPETH: Object to form. Has he			
19 Q Does that seem accurate?	spoken to anybody today?			
	20 MR. BEKESHA: About testimony today.			
20 A Yes.	with Bekesting rounds.			
20 A Yes. 21 Q I just want to turn your attention	21 Q Have you spoken to anybody about the			

1 because we don't want to get into those privileged conversations? 2 Yeah, no, just generally made some 3 A 4 people close to me aware of scheduling, being unavailable today for testimony. Have you talked to them about Q substance? 8 A No. 9 Q Have you spoken to Secretary Clinton, 10 President Clinton, Ms. Abedin or anyone else since 11 the news broke about this issue, about the issues 12 we've talked about today? 13 MS. SHAPIRO: Objection to form. MR. SPETH: Object to form as to news 14 15 broke. 0 Since the New York times article in 16 17 2015, have you ever spoken to Secretary Clinton, 18 President Clinton, Ms. Abedin about the issues we've 19 talked about today since 2015? 20 MR. SPETH: Same objection. 21 Of that group, I've spoken to A 22 President Clinton. 90 What did you talk to President Clinton 0 about? What did you discuss? 3 At one point he just asked me for a A brief description of what the server was. Was that the extent to the 0 conversation? 7 A Have you talked to any of those Q 9 individuals' lawyers about the issues we talked about 10 today? You know I've spoken to Cheryl Mills 12 if she was serving as their lawyer in a general 13 capacity. How many times have you spoken to 14 Q 15 Ms. Mills about the issue?

About the issue, I couldn't say.

About the domain name, the e-mail

22 more than anything else. I'm sure it's come up in

20 accounts and the issues discussed today.

MR. SPETH: Object to form as to what

I couldn't say. We speak as friends

16

17

18 19

21

the issue.

Q

91 1 discussion. 2 Q Do you know what you talked about? 3 A Not substantively. Just the timing of things. 5 In preparing for today's testimony, 0 did you review any documents or records? I reviewed the 302s that were released 8 by the FBI. My interviews as well as reviewed the 9 transcript of my congressional testimony. And 10 materials which your office provided like a day 11 yesterday. 12 Q Did you only testify before Congress 13 one time? 14 A Correct. 15 Q To the best of your knowledge, have 16 all your answer been truthful today? **17** A Yes. 18 Is Secretary Clinton, Present Clinton 0 19 or anyone affiliated with them paying your legal 20 bills related to this matter or any other matters 21 concerning Secretary Clinton's e-mail usage? MR. SPETH: Object to form. Vague. A Sorry. Could you repeat the question? 1 O Sure. Is Secretary Clinton, President Clinton or anyone associated with them paying your legal bills for today or any other matters related to Secretary Clinton's use of e-mail?

6 MR. SPETH: Same objection.

7 A In relation to today it's unclear to 8 me if I'll be reimbursed for these — for legal fees 9 from the Clintons. My previous legal fees about a 10 year after the conclusion of the congressional 11 testimony through my lawyers was negotiated for 12 settlement for the Clintons to make payment.

13 Q When you refer to Clintons, is that14 Clinton executive service or the Clintons personally?

15 A I don't know what entity took care of 16 that.

17 Q So you don't know if it's President 18 Clinton, Secretary Clinton or them jointly?

19 A I don't know.

20 Q Besides what we just discussed, has 21 Secretary Clinton, President Clinton or anyone 22 associated with them provided you with any additional

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		Conducted on 1	1		, _	
1	financial	incentives related to today's testimony in	1	all?		95
2		il matter more generally?	2		A	I made her aware that it was
3		MS. SHAPIRO: Object to form.	3	sche	dule	
4	Mis	scharacterization.	4		Q	That was it?
5		MR. SPETH: Same objection.	5		A	Yes.
6	$\mathbf{A}$	No.	6		Q	Did you have conversations with her
7	Q	Now that we are about ten years later,	7	befo	re yo	u testified before Congress?
8	do you r	egret setting up the Clintonemail.com domain	8		A	I don't recall.
9	name and	d the e-mail addresses?	9		Q	Did you have any conversations with
10		MS. SHAPIRO: Objection to relevance.	10	her b	efore	e you spoke with the FBI?
11		MR. SPETH: Objection to form.	11		A	I certainly don't recall.
12	Q	You can answer the question.	12		Q	Do you know if you ever talked to
13	A	I don't think my opinion matters here.				about what you were going to testify about
14	Q	But do you regret it?	14	or w	hat y	ou were going to tell the FBI?
15		MS. SHAPIRO: Same objection.	15	5	A	That's not something that I would have
16		Again, I don't think my opinion	16	shar	ed.	
1	matters		17		Q	When did you last speak with
18	Q	Could you answer the question please?			Abed	
19		I don't regret it.	19		A	No idea.
20	Q	Thank you.	20		Q	Not recently?
21		MR. BEKESHA: Let's take a very short	21		A	Not recently.
22	bre	ak and we should all be set.	22		Q	Have you spoken to Secretary Clinton
1		THE VIDEOGRAPHER: We're off the	1	recei	ntly?	96
2	rece	ord at 10:04.	2		A	No.
3		(Whereupon, a short break was taken.)	3		Q	Have you spoken with President Clinton
4		THE VIDEOGRAPHER: Back on the record	4	recei	ntly?	
5	at 1	0:12.	5		A	Just at the end of last year.
6	Q	Thank, Mr. Cooper. Just very few	6		Q	Anything related to e-mails?
1	more.		7		A	Not at all.
8		Do you know Heather Simonson?	8			MR. BEKESHA: I have no other
9	A	Yes.	9		-	itions.
10	Q	Who is she?	10			MS. SHAPIRO: We have no questions.
11	A	She's a woman who over the years	11			MR. SPETH: No questions.
		for Secretary Clinton. I'm not sure in what	12			THE VIDEOGRAPHER: This concludes
1	-	capacities.	13			y's proceeding. The total number of
14	-	Do you communicate with her?	14			s used were two. We're off the record
15	A	I'm sure I have at some point in time.	'	at 10	0:14.	THE COURT REPORTED. A
16	•	Did you ever communicate with her	16		orint <sup>C</sup>	THE COURT REPORTER: Are you getting a
		cretary Clinton's e-mails?  Not that I recall.			cript?	
18			18 19			SPETH: Yes, please. BEKESHA: We'll take it as a rush
19	Q Mills?	When did you last speak with Cheryl			serv	
1	A	Last week.	20 21		SCIV	
21		Did you talk about this deposition at			t eve	THE COURT REPORTER: You're talking editing?
22	Q	Dia you taik about this acposition at	144	avou	ı exp	cumig:

Conducted on	March 14, 2019
1 MR. BEKESHA: Yes.	1 STATE OF NEW YORK )
2 MR. PEZZI: I'm ordering the	2 ) ss.:
3 transcript.	3 COUNTY OF NEW YORK )
4 (Time noted: 10:15 a.m.)	4 CERTIFICATE
5	5
6	6 I, CHRISTINE CUTRONE, Shorthand Reporter and
7	7 a Notary Public within and for the State of New
8	_
8 9	
10	10 before set forth was duly sworn and that such an
11	11 examination is a true record of the testimony
12	12 given by such a witness.
13	13 I further state that I am not related to any
14	14 of these parties to this action by blood or
15	15 marriage, and that I am not in any way interested
16	16 in the outcome of this matter.
17	17 IN WITNESS WHEREOF, I have hereunto set my
18	hand this 19th day of March, 2019.
19	19 Reading and signing was not requested.
20	20 Chusters Cutore opened was made one of the open of the opened of the
21	21 Comment of the control of the con
22	22 CHRISTINE CUTRONE
1 ACKNOWLEDGMENT OF DEPONENT 2 I, JUSTIN COOPER, do hereby 3 acknowledge that I have read and examined the 4 foregoing testimony, and the same is a true, correct 5 and complete transcription of the testimony given by 6 me and any corrections appear on the attached Errata 7 sheet signed by me.	
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10 (DATE) (SIGNATURE)	
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