PAGE REQUESTS STATE OF WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT EQUAL RIGHTS DIVISION MILWAUKEE COUNTY Marilyn Figueroa's personal effects 2 DEPOSITION of PATRICIA K. STAWICKI, called as a witness, taken at the instance of the Complainant, 5 MARILYN FIGUEROA. under the provisions of Chapter 804 of the Wisconsin 6 Complainant, FRD Case No. Statutes, pursuant to notice and subpoena duces 7 CR200003454 tecum, before Taunia Northouse, a Registered 8 CITY OF MILWAUKEE. Diplomate Reporter and Notary Public in and for the 9 Respondent. State of Wisconsin, at the offices of 10 Murphy, Gillick, Wicht & Prachthauser, Attorneys at 11 Law. 330 East Kilbourn Avenue, City of Milwaukee, 12 Deposition of: County of Milwaukee, and State of Wisconsin, on the 13 PATRICIA K. STAWICKI 14th day of March 2002, commencing at 9:20 in the 14 Milwaukee, Wisconsin March 14, 2002 15 forenoon. 16 17 APPEARANCES Reporter: Taunia Northouse, RDR, CRR 18 VICTOR M. ARELLANO, Attorney, for LAWTON & CATES, S.C., Attorneys at Law, 10 East Doty Street, Madison, Wisconsin, appearing on behalf of the Complainant. 19 20 21 BRUCE D. SCHRIMPF and LEONARD A. TOKUS, Assistant THE CITY ATTORNEY, 200 East Wells Street,
Milwaukee, Wisconsin, appearing on behalf 22 23 of the Respondent. 24 25 Also present: Cheri Garcia 1 N D E X PATRICIA K. STAWICKI, 1 2 Page(s) WITNESS 2 called as a witness, being first duly sworn, 3 PATRICIA K. STAWICKI 3 testified on oath as follows: Examination by Mr. Arellano 4 4 5 5 EXHIBITS **EXAMINATION** Identified Description No. 6 6 By Mr. Arellano: Complainant's Supplemental Request 13 1 for Production of Documents Subpoena Duces Tecum 7 7 Q Good morning, ma'am. My name is Victor Arellano. I 8 8 represent Marilyn Figueroa. To my left is Ms. Figueroa's employment file 38 9 9 Ms. Cheri Garcia. She's our law firm paralegal. I 3 Vacation and sick leave records 69 10 10 will be asking you questions today and obviously I 123 Memo 1/21/00 to Pat Stawicki from 11 would expect you to understand my questions. 12 Computer form 74 12 A Okay. 13 6 Time card records 80 13 Q And if you don't, I want you to feel comfortable and Vacation and sick leave records 92 14 14 7 let me know that. 15 109 15 8 Family Medical Leave Act information A I will. 16 Memo 1/14/00 to Pat Stawicki from 16 9 Q You are not a party to this lawsuit. You're just a Michael Soika 17 17 potential witness. At times as I question you Memo 1/21/00 To Whom it May Concern 10 142 18 From Dr. Loiben 18 counsel may object, and at times he may even argue 19 Letter 1/14/00 to Marilyn Figueroa from Michael Soika 19 11 144 or I may even argue. I'm going to try not to. 20 20 Memo 2/2/00 to Pat Stawicki from 150 21 But that has nothing to do with you. That's what 21 Michael Soika 22 lawyers unfortunately sometimes do. He is entitled 22 Memo 1/25/00 to Pat Stawicki from 153 13 23 23 to register any objections he believes should be (Attached to the original transcript and copies provided to counsel) (Original transcript filed with Attorney Arellano) 24 recorded, and all you've got to do is wait until he 25 objects. And unless he tells you not to answer, I 25

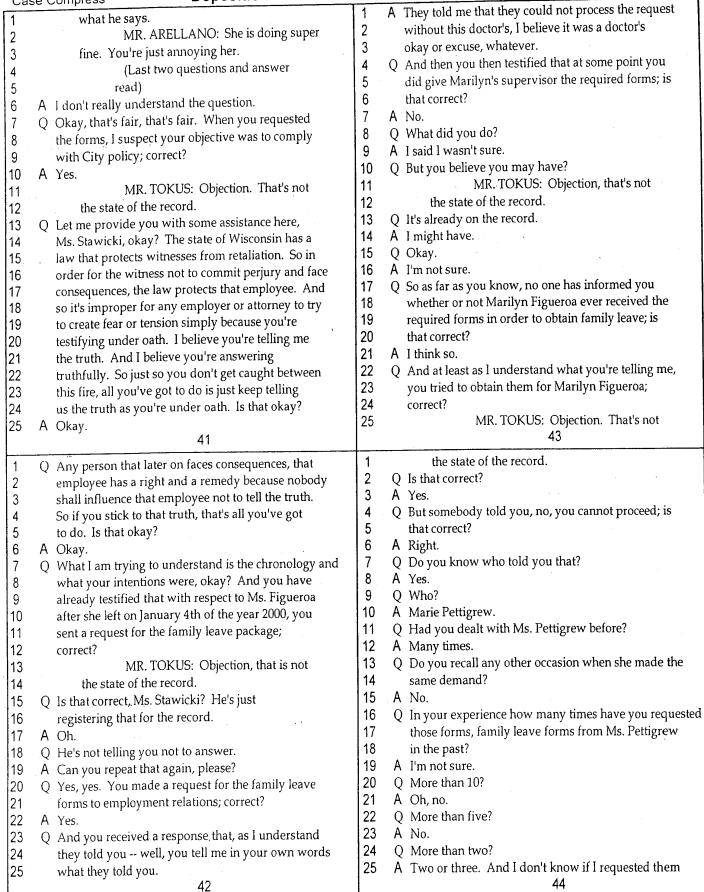
	se Compress Deposition of PATRICI			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1	Q What kind of certificate did you get?	1		husband's relationship or directly related to you,
2	A It was a piece of paper stating my name and that I	2	_	any relative employed by the City of Milwaukee?
3	had completed a course.	3		No, not that I can remember.
4	Q What area were you studying?	4	Q	And let's talk a little bit about you. What's your
5	A Supervisory.	5		current occupation?
6	Q Any other academic accomplishments other than these	6	Α	My title is program assistant 2. I would say mainly
7	MATC courses that you took?	7		in the clerical field.
8	A No, none.	8	Q	And who do you work for?
9	Q What about training? Any training that you may have	9	Ā	City of Milwaukee.
10	received in any professional arena?	10	0	And what department do you work for?
	A I can't remember any	11		Mayor's office.
111		12		And how long have you worked specifically as a
12	Q Okay.	13	•	program assistant 2?
13	A special.	14	Α	I don't know exactly. I'll say four years.
14	Q Are you married?	15		And before that where did you work?
15	A Yes, I am.	16	-	Mayor's office.
16	Q What's your husband's name?	17		And what was your title at that time?
17	A John Stawicki, Jr.	18		Administrative assistant 2.
18	Q Do you have any children?	19		And for how long were you an administrative
19	A I do not.	20	V	assistant 2 within the Mayor's office?
20	Q Have you ever been divorced?	21	Δ	I really don't know the number of years.
21	A No.	22		Give me a rough number.
22	Q You're married to this gentleman for how long?	23	•	10 years.
23	A 24 years.	24		10 years. And before that where did you work?
24	Q Wonderful. And where does he work?	25		
25	A He's retired.	25	^	Mayor's office.
. L_	9	ļ		
1	Q Where did he work?	1	Q	And what was your title at that time?
7 '	V	1 -		
2	A City of Milwaukee.	2	Α	Clerk stenographer 4.
- 1		2	A Q	Clerk stenographer 4. Do we still have those titles? Not anymore.
2	A City of Milwaukee. Q What department?	3 4	A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so.
2 3	A City of Milwaukee.	3 4 5	A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer?
2 3 4	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. 	3 4	A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4.
2 3 4 5	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? 	3 4 5 6 7	A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer
2 3 4 5 6	A City of Milwaukee.Q What department?A Building inspection.Q And when did he retire?	3 4 5 6 7 8	A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4?
2 3 4 5 6 7	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. 	3 4 5 6 7 8 9	A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know.
2 3 4 5 6 7 8	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? 	3 4 5 6 7 8 9	A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have
2 3 4 5 6 7 8 9	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? 	3 4 5 6 7 8 9 10	A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know.
2 3 4 5 6 7 8 9 10	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. 	3 4 5 6 7 8 9	A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have
2 3 4 5 6 7 8 9 10 11 12	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same 	3 4 5 6 7 8 9 10	A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going
2 3 4 5 6 7 8 9 10 11 12 13	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. 	3 4 5 6 7 8 9 10 11	A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you.
2 3 4 5 6 7 8 9 10 11 12 13 14	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No.	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years?	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No.	3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education?	3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years that he worked for the City of Milwaukee?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus? No, not that I'm aware of. I don't know when he started with the City.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years that he worked for the City of Milwaukee? A He worked in the water department, and I believe he	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus? No, not that I'm aware of. I don't know when he started with the City. That would be painful. I mean with any lawyer,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years that he worked for the City of Milwaukee? A He worked in the water department, and I believe he was a meter reader. 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus? No, not that I'm aware of. I don't know when he started with the City. That would be painful. I mean with any lawyer, hanging around any lawyer would be painful. I
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years that he worked for the City of Milwaukee? A He worked in the water department, and I believe he was a meter reader. Q Did he ever hold a supervisory position?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus? No, not that I'm aware of. I don't know when he started with the City. That would be painful. I mean with any lawyer, hanging around any lawyer would be painful. I didn't mean with him personally.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years that he worked for the City of Milwaukee? A He worked in the water department, and I believe he was a meter reader. Q Did he ever hold a supervisory position? A No.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus? No, not that I'm aware of. I don't know when he started with the City. That would be painful. I mean with any lawyer, hanging around any lawyer would be painful. I didn't mean with him personally. And have you worked for 45 years within the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A City of Milwaukee. Q What department? A Building inspection. Q And when did he retire? A I'm guessing six years ago. Q And who was his supervisor? A I'm not sure if it was Alex LeGrand or Lee Jensen. I believe his last supervisor was Lee Jensen. Q And how long did he work for the City of Milwaukee? A I'm guessing. I'm going to say 30 years. Q 30 years. And did he work for the same department A No. Q for 30 years? A No. Q What was his academic education? A He had some college. Q What was his field of interest during those 30 years that he worked for the City of Milwaukee? A He worked in the water department, and I believe he was a meter reader. Q Did he ever hold a supervisory position?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	Clerk stenographer 4. Do we still have those titles? Not anymore. I don't think so. And you were clerk stenographer? 4. 4. And for how long were you a clerk stenographer 4? Six, 10 years. I don't know. Well, let's get down to the bottom. How long have you worked for the City of Milwaukee? I'm not going to punish you. 45 years. 45 wonderful years, okay. 45 years. What year did you start? 1956. 1956. And have you been working since 1956 with Mr. Tokus? No, not that I'm aware of. I don't know when he started with the City. That would be painful. I mean with any lawyer, hanging around any lawyer would be painful. I didn't mean with him personally.

Deposition of PATRICIA A. STAWICKI 3/14/02

Cas	e Co	ompress Deposition of PATRICIA	λ A.	<u>ی</u> ا	AVVICAT 3/14/02
1	ł	hat she can get my entire question, and then I've	1		to get caught in the litigation. And the way to not
2		got to give you a chance so she can get your entire	2		get caught is just by simply telling me what you
3		answer. Is that okay?	3		know while you are under oath. Is that fair?
		That's okay.	4		Correct.
		We're doing fine.	5	Q	Are you a civil service employee or are you
5	-	-	6		politically appointed?
6	A '	Okay. Then you went over this document with Barb?	7	Α	I'm a civil service employee.
7			8	Q	So you do not serve at the pleasure of the Mayor to
8	A	Yes. Is that correct? Did you go over each and every	9		the extent that he can fire you without going
9			10		through the civil service system?
10	٨	question?	11.	Α	That's correct.
11	A	We skimmed over the questions.	12		You have your protections?
12	Q	Were there any specific questions that you felt	13		Right.
13		would be relevant to your position?	14	0	Is that correct? And I suspect you enjoyed your
14		Yes.	15	~	experience with former Mayor Ziegler?
15	Q	Which questions did you find?	16	Α	Yes.
16	Α	I don't know exactly which requests they were, but	17		How long did you serve for him? Or how many terms
17		they were requests for payroll records, payment	18	V	did he serve to be more precise?
18		certifications.	19	Δ	He was finishing up I believe his last term.
19	•	Where did	20		When you arrived?
20	Α	Sick leave.	21	-	Right.
21	Q	What questions what specific number are you	22	α	When you got your first job with the City of
22		referring to? As I understand each question is	23	Q	Milwaukee, was this pursuant to a recruitment
23		identified by number, or by request number?	24		system, or were you assigned or given a job by any
24		Yes.	25		of the mayors?
25	Q	So which?	23		19
		17	 -		
1	Α	Request No. 1.	1	Α	No. It was I took an exam and I placed among the
2	Q	Any other request numbers?	2		first three.
3		No. 2.	3		Wonderful.
4	Q	Any other one?	4	ρ	A And I went for an interview.
5	Α	No. 14.	5	(Wonderful. So mayors may come and go, but your job
6	Q	Any other?	6		has continued with the City within the Mayor's
7 .	Α	16, 17. I'm not sure whether we discussed 35.	7	,	office?
8	Q	Do you believe 35 would fall within the scope of	8	F	Yes.
9		your responsibilities or would apply to anything	9	(And would it be fair and accurate to say that you're
10		that you know of?	10		well familiar with practices within the Mayor's
11	Α	I would have personnel records of the employees in	111		office?
12		the Mayor's office, and these things would be in	12		A Yes.
13		there, if there were things like that. No. 47,	13	(Would it be also fair and accurate to say that you
14		No. 50. I think that's it.	14		are well familiar with procedures, rules, policies
15	Q	Okay, very good. You can keep that in front of you.	15		of the City as they pertain to your job?
16	•	Is it Stawicki or Stawicki?	16	1	A There may be some that I don't know about. I can't
17		Stawicki.	17		say for sure.
18	Q	Stawicki. If I somehow massacre your last name, I	18		Q We'll go into some of that.
19	`	apologize.	19		A Okay.
20	Α	Okay.	20	(Q I suspect it would also be fair and accurate to say
21	0	Very often witnesses are placed in a difficult	21		that you're well familiar with how the Mayor runs
22	*	predicament because unfortunately as a result of	22		all the paperwork within the office, at least as far
23		their job, their employment they may become	23		as your job is concerned?
24		witnesses in a case. And I usually advise most of	24		A As far as my job is concerned.
25		these folks that are not parties to the lawsuit not	25		Q What about former Mayor Henry Maier? How long di
1-0		18			20
		1			Page 17 to Page 20

Cas	e C	ompress Deposition of PATRICIA	1 A.	<u> </u>	1 1 1 - I - I - I - I - I - I - I - I -
1	0	Political consultant?	1		anywhere between January and April; is that correct?
2		I don't know.	2		That I worked in the phone bank?
3	$\hat{\cap}$	What type of consultant do you believe he is?	3	-	Right.
4	Δ	I really don't know	4	Α	Right.
5	$\hat{\Omega}$	To your knowledge, is Mr. Christofferson still	5	Q	Do you remember if it was January or February?
6	V	associated with Mayor Norquist's political campaign?	6		I don't remember.
7		I think he is.	7	Q	March? Do you remember when Ms. Marilyn Figueroa
8		Wonderful.	8		left the Mayor's office?
9	•	I'm not positive.	9		I don't remember the exact date.
10	$\overline{}$	What years do you believe Mr. Christofferson was the	10		Do you remember the month?
11	Q	chief of staff for Mayor Norquist?	11	Α	I believe it was January.
12	Δ	I believe it was the first year that the Mayor took	12	Q	Now using that month, do you recall whether or not
13		office.	13		you worked on Mayor Norquist's political re-election
14		Any other time?	14		before Ms. Figueroa left or after she left?
15		Not that I can recall.	15		I don't know.
16	$\hat{0}$	You look very wonderful and I don't know how old you	16	Q	If I were to tell you that the records indicate that
17	~	are, but and you are very eloquent. Are you	17		the last day at the Mayor's office was January 4th
1,8		under the influence of any medication that may	18		of the year 2000, would that help you to remember
19		inhibit or affect your ability to remember?	19		whether you worked for the Mayor's re-election
20	Α	Not that I'm aware of.	20		campaign before January 4th or after January 4th?
21		Okay.	21	Α	No, I it would not help.
22	Ă	I take blood pressure drugs.	22	Q	Well, how many days did you work in the phone bank?
23	0	Do they in any way affect you?	23		One.
24	Α	No.	24		One day?
25	O	How did you happen to volunteer to work on	25	Α	One.
	`	25	<u> </u>		27
1		Mayor Norquist's political campaign? Did somebody	1		How many hours did you put in?
2		ask you, given that you did not participate before?	2	Α	I'm going to guess two.
3	Α	I really don't remember.	3	Q	Two. Was this your first political experience, at
4	0	Did any other member of your family work on the	4		least in political campaigns?
5		political campaign of Mayor Norquist?	5		No.
6	Α	My husband brought me to the phone bank, and instead	6	Q	Had you done political work before?
7		of just waiting for me he folded some letters.	7	Α	I made phone calls during the Maier administration.
8	Q	And this happened what year when you worked?	8	Ç	What about during the Norquist administration, do
9	À	It was the last election, so it would have been I	9		you recall any other time?
10		believe 2000.	10		No.
11	Q	The year 2000?	11		Other than the one for the year 2000?
12	Α	Yes.	12		No, I don't.
13	Q	Do you remember the month approximately? It should	13		This was the only time?
14		have been before his re-election; right?	14		Yes.
15	Α	Shortly before his re-election.	15	(Is that correct? I suspect since you are a civil
16	Q	Do you know exactly when he was re-elected, the	16	^	service employee you're not really required to?
17		date? Was that April 4th?	17	_	A That's correct.
18		I don't know.	18		Is that the way you felt?
19	Q	Are you good with dates, numbers? You sound like	19		A That's right. Output Outpu
20		you are.	20	(All right, very good. During all of your years working for the Mayor's office do you recall any one
21		Not with dates.	22		time when you received a demotion or any type of
22	•	Good with numbers but not with dates?	23		suspension?
23		Well I'm not sure.	24		Suspension: A Me personally?
24	Q	We'll find out. So if you worked in his political	25		Yes, we're talking about you.
25		campaign in the year 2000, it would have happened	23		28
		26 (608)		770	

		se Compress Deposition of PATRICIA		,	Ol I II IIlevel relations see what I
ſ	1	Q ls the doctor required to sign any of the forms that	1	Α	Okay. I would call employee relations, see what I
	2	you referenced here?	2		needed to do to get them on family leave and then do
-		A I can't recall.	3		whatever they tell me.
		Q If Ms. Florence Dukes testified that a form is	4 -	Q	Send them the forms?
)	5	needed to be signed by the doctor, would you have	5		
١	6	any contention with that?	6	Q	And let them know what is required?
	7	A No, I would not.	7		Yes.
	8	Q Do you know Ms. Florence Dukes?	8	Q	All right. Tell me a little bit more about these
	9	A I know who she is.	9	·	forms. What do they contain? What kind of
	10	Q How long have you known her?	10		information do they contain?
	,	A Since she's been in employee relations I've known of	11	Α	I'm not really positive. It asks, I believe it asks
	11 12	i	12		why you require the family leave, the length of time
	i	her. Q Do you know what her job title is?	13		you are requiring it, and possibly whether you want
	13	A I believe she's directly under Jeff Hansen, which	14		it taken off the vacation or sick leave or unpaid
	14	would make her I'm guessing assistant director of	15		time. But I'm not positive if that's what it
	15		16		contains.
	16	personnel. Q Do you know what her specialty is as an assistant	17	0	And are these forms required to be signed by the
	17		18	~	employee?
	18	director to employment relations?	19	Α	Yes, I believe they are.
	19	A No. Q Would she be someone that you would consult if you	20		Are they required to be signed by the doctor?
	20		21		I'm not positive.
	21	have any questions on family leave?	22		You don't recall?
	22	A 1 don't think I would call her personally.	23	•	No.
	23	Q Who would you call?	24		But you basically use the same forms
	24	A I probably would call I can't think of any names	25		Yes.
	25	right now, but I wouldn't go to the top. I would 33	20	,,	35
	L	00			
,	1	call clerical.	1	Q	all the time? This form that inquires as to the
	2	Q Who do you usually deal with for these types of	2		type of leave and the reasons why a medical leave is
	3	requests? Do you have any one person, or would you	3		being requested, are these forms required? Are they
	4	just send the request to the employment relations	4		a must
	5	office? You tell me your procedure.	5		Yes.
	6	A I'm not sure.	6		in order to process family leave?
	7	Q Do you believe that Ms. Florence Dukes would be	7		Yes.
	8	knowledgeable on employment relations matters?	8		And then what do you do with those forms?
	9	A I don't know.	9	Α	One is generally in their file, and I believe one is
	10	Q You say she is a higher up. She's considered one of	10	_	sent to Department of Employee Relations.
	111	the top administrators within employment relations?	11	Ç	When somebody tell me usually the procedure that
	12	A Yes.	12		takes place within the Mayor's office when somebody
	13	Q Very good. Now, tell me with respect to	13		requests family leave. Who do they go to?
	14	Ms. Ruth Wyttenbach what specific procedure did you	14		I would assume they would go to their supervisor.
	15	follow when she requested family leave?	15		And then
	16	A I don't know. I can't remember.	16	P	Their supervisor in turn would tell me that they
	17	Q What about Ms. Marshall?	17		have requested it.
	1		18	(And then you obtain the package?
	18	A 1 don't remember.	3		
		A I don't remember. Q If somebody let's assume based on the practice	19		Yes.
	18	Q If somebody let's assume based on the practice that you have implemented in your office, if	19 20	(And the package would contain the forms; true?
	18 19	Q If somebody let's assume based on the practice	19 20 21	F	And the package would contain the forms; true? Yes.
	18 19 20	Q If somebody let's assume based on the practice that you have implemented in your office, if	19 20 21 22	F	A And the package would contain the forms; true? Yes. The instructions on how to meet City requirements
	18 19 20 21	Q If somebody let's assume based on the practice that you have implemented in your office, if somebody calls and says I need family leave, what	19 20 21 22 23	F	And the package would contain the forms; true? Yes.
)	18 19 20 21 22	 Q If somebody let's assume based on the practice that you have implemented in your office, if somebody calls and says I need family leave, what would then be your first step to follow? A I don't think they would talk to me first. 	19 20 21 22	() () ()	A And the package would contain the forms; true? A Yes. The instructions on how to meet City requirements for family leave? A I'm not sure.
	18 19 20 21 22 23 24	 Q If somebody let's assume based on the practice that you have implemented in your office, if somebody calls and says I need family leave, what would then be your first step to follow? A I don't think they would talk to me first. Q Let's assume that you know that somebody wants to 	19 20 21 22 23	() () ()	And the package would contain the forms; true?Yes.The instructions on how to meet City requirements for family leave?
	18 19 20 21 22 23	 Q If somebody let's assume based on the practice that you have implemented in your office, if somebody calls and says I need family leave, what would then be your first step to follow? A I don't think they would talk to me first. 	19 20 21 22 23 24	() () ()	A And the package would contain the forms; true? A Yes. The instructions on how to meet City requirements for family leave? A I'm not sure.



Ċas	se Co	ompress Deposition of PATRICIA			
1	0	that form.	1		Is that correct?
2	À	Here's the one I put on the computer.	2	Α	Uh-huh.
3	O	Let me see that. Thank you. I'm going to approach	3	Q	Who, if anyone, directed you to use January 22nd?
4	•	you so the two of us have access to this record.	4	Α	Okay. What happened is I was directed at one point
5		Okay.	5		to use up all Marilyn's vacation time, to use up all
6	$\hat{\Omega}$	Is that okay? I promise to be respectful; all	6		her sick leave. And then when she had no more
7	V	right? I'm looking at a document which is a part of	7		balances, I was to put her on this family medical
8		Exhibit No. 2 of your deposition, Soika's 24. And	8		leave.
		you directed me to a form which is in a computer	9	Q	Okay, very good. Who directed you to do that?
9		printout; is that correct?	10	-	Mr. Soika.
10			11		What's the most what's the extent of a family
11	Α.	Correct.	12	`	medical leave under City policy? How many weeks?
12		Can you tell us for the record what's this form all	13	Α	I'm not positive. I'll say six or 12 weeks. I'm
13		about?	14	,,	not sure.
14	А	This is a form which is used to request a leave of	15	\cap	Did Mr. Soika instruct you as to how long
15	_	medical unpaid leave, FMLA, medical unpaid.	16	-	No.
16	Q	And walk me through this form. This form was	17		she would be on medical leave?
17		completed by you?	18	•	No.
18		I believe it was.	19		Was it left indefinite?
19	Q	And I believe in the center area of this computer	20		He did not give me a date.
20		printout which you have identified as the family	i e	^	And so you placed Marilyn Figueroa on family medical
21	_	leave processing form; is that correct?	21 22	Ų	leave as instructed by Mr. Soika?
22		Yes.		۸	•
23	Q	It addresses Marilyn Figueroa at the top; is that	23		Right.
24		correct?	24	-	On 1/22/00; is that correct?
25	Α	Yes.	25	А	Yes. 51
		49			
1	Q	And then there is an I.D. number; is that correct?	1	Q	And then the next thing is action or reason; is that
2	À	Yes.	2		correct?
3	Q	What is the significance of that I.D. number?	3		Leave of absence.
4	A	The I.D. number is like a payroll number.	4	•	Leave of absence?
5	Q	And then there is another symbol in here,	5		Right.
6		employment	6	Q	Who instructed you to place Marilyn under leave of
7	Α	The number of records. I believe that's what it	7		absence; Mr. Soika?
8		means, employed record.	8		Yes.
9	Q	And what is the significance of that?	9	Ç	And then we continue on the next little block or
10	À	Sometimes you might put two or three records through	10		square here. What is that? CL?
11		in a day.	11	Α	It's when you put your cursor on here it brings down
12	Q	And on that particular occasion you only sent this	12		a block and whatever this number is. I can't read
13	`	form?	13		it. It looks like C4L or something.
14	Α	It looks like that.	14) What's the significance?
15		And least that's what the record seems to reflect.	15	Α	Means this comes on there then, this FMLA medical
16	•	Yes.	16		unpaid leave.
17		Is that correct?	17	(lt's a code?
18	•	Yes.	18		Yes.
19		And then it talks about the effective date; is that	19		For this particular type of action; is that correct?
LIO	V	correct?	20		A It's a code.
20			21		So then you placed it on FMLA?
20	Δ	Vρς		,	· / 1
21		Yes. If you know, who printed that date in there?		F	Yes.
21 22	Q	If you know, who printed that date in there?	22		A Yes. Dash medical?
21 22 23	Q A	If you know, who printed that date in there? I did.	22 23	(Q Dash medical?
21 22 23 24	Q A Q	If you know, who printed that date in there? I did. And that would be January 22nd of the year 2000?	22 23 24	(2 Dash medical? A Unpaid leave.
21 22 23	Q A Q	If you know, who printed that date in there? I did.	22 23	(Q Dash medical?

	Case		mpress Deposition of 1741470	4	A m 1 ((
Γ	1	tŀ	ne shortest route here, assuming that she was on	1	A They do offer unpaid leave.
1	2	m	nedical leave for six weeks, when would she have to	2	Q So they do exist, but you're not able to
	3		ave returned?	3	determine
١.		11	MR. TOKUS: Objection, that's not	4	A I don't know how long.
A I	4		the state of the record.	5	Q how long, okay. But that is one additional
- 1	5		MR. ARELLANO: That's not even a	6	benefit, true, unpaid leave?
1	6			7	A Yes.
1	7		record. It's just a question. You're just	8	MR. TOKUS: Now make sure he
1	8		instructing her. Let's go back to my original	1	
١	9		question subject to his objection.	9	finishes his question before you start to
-	10		MR. TOKUS: Make sure you	10	answer; okay?
- 1	11		understand the question.	11	THE WITNESS: Okay.
	12	0.1	Yes. My question is, it's a mathematical question.	12	Q Because so far I haven't heard any really valid
	13	, V	It's simple. If she went on family leave according	13	objection, in all fairness to you. When he says
- 1		1	to your notes on January 22nd, 2000, let's take six	14	that is not the state of the record, he's just
•	14	ι	weeks pursuant to City policy as opposed to 12, when	15	trying to influence you. And that can push you into
- 1	15	1	weeks pulsualit to City policy as opposed to 12, when	16	the perjury side. So don't listen to that. He will
	16		was she due to return?	17	make his record. We'll let the record speak for
	17	A I	I don't know the exact date.	18	itself, and you just concentrate on the question.
- 1	18		Well, six weeks would be when, do you think?	19	Is there a difference between
	19		I'm guessing March.		MR. TOKUS: I object to your also
	20		Okay, March 22nd?	20	telling the witness about being pushed into
	21	A	That's only a guess.	21	
	22	Q I	l understand that. We're not holding you to	22	perjury side.
	23		anything. That would have been March 22nd	23	
	24		approximately?	24	potential if she starts paying attention to
	25	Α	No, no. Six weeks, February has four weeks, and	25	
			57		59
\	1		there's probably one more week left in January	1	to her and unnecessary. Let's move on.
	1		there's probably one more week left in January.	1 2	to her and unnecessary. Let's move on. MR. TOKUS: I object to your
)	2		That would be five. The six-week	2	MR. TOKUS: I object to your
):		Q	That would be five. The six-week About March 10?	2 3	MR. TOKUS: I object to your telling the witness false information.
).	2 3 4	Q A	That would be five. The six-week About March 10? Around that time.	2 3 4	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the
):	2 3 4 5	Q A O	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to	2 3 4 5	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus.
).	2 3 4 5 6	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have	2 3 4	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling
)	2 3 4 5 6 7	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned?	2 3 4 5 6 7	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being
)	2 3 4 5 6	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess.	2 3 4 5 6 7 8	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you.
):	2 3 4 5 6 7	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you	2 3 4 5 6 7 8 9	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all
):	2 3 4 5 6 7 8	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in	2 3 4 5 6 7 8 9	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness.
).	2 3 4 5 6 7 8 9	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in	2 3 4 5 6 7 8 9 10	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and
)	2 3 4 5 6 7 8 9 10	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more	2 3 4 5 6 7 8 9	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go.
).	2 3 4 5 6 7 8 9 10 11	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions.	2 3 4 5 6 7 8 9 10	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus
	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second	2 3 4 5 6 7 8 9 10 11	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus
).	2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical	2 3 4 5 6 7 8 9 10 11 12 13	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion?
).	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know.
)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave? I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you just one more time. Do you recall there is a record
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave? I don't know. MR. TOKUS: Objection. That's not	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you just one more time. Do you recall there is a record here written to you from Mr. Soika? He sent you
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave? I don't know. MR. TOKUS: Objection. That's not the state of the record.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you just one more time. Do you recall there is a record here written to you from Mr. Soika? He sent you that on January 14th.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	QAQ AQ AAA	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave? I don't know. MR. TOKUS: Objection. That's not the state of the record. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 23	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you just one more time. Do you recall there is a record here written to you from Mr. Soika? He sent you that on January 14th. A Yes.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	QAQ AQ AAA	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave? I don't know. MR. TOKUS: Objection. That's not the state of the record. I don't know. Do you know if the City offers as one of the many	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 23 24	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you just one more time. Do you recall there is a record here written to you from Mr. Soika? He sent you that on January 14th. A Yes. Q Where he's notifying you that Marilyn had called
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQ AQ AAA	That would be five. The six-week About March 10? Around that time. And if she were to be given 12 weeks according to City policies, when do you think she would have returned? The second or third week of April. That's a guess. And to your knowledge, if Marilyn let me ask you to assume just one second, ma'am. And keep that in front of you because I may ask you some more questions. Let me ask you to assume for just one second that her doctor placed Marilyn on indefinite medical leave. Yes. And the 12 weeks that she's entitled under City policy has expired. Under City policy can she still apply for unpaid leave? I don't know. MR. TOKUS: Objection. That's not the state of the record. I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 23	MR. TOKUS: I object to your telling the witness false information. MR. ARELLANO: I'm not telling the witness. I'm telling you, Mr. Tokus. MR. TOKUS: I object to you telling me false information, and I will not being lectured to by you. MR. ARELLANO: You're doing all this intentionally to distract the witness. She's got a duty to answer truthfully and she's doing it. Let's go. Q Is there a difference between unpaid leave versus leave of absence in your opinion? A I don't know. Q But both are benefits that City employees have available upon approval; correct? A I believe so. Q All right, all right. I'm going to approach you just one more time. Do you recall there is a record here written to you from Mr. Soika? He sent you that on January 14th. A Yes. Q Where he's notifying you that Marilyn had called

C	Case	e Co	ompress Deposition of PATRICI	<u> </u>	31	ATTION OF THE
1			THE WITNESS: No.	1		Did anyone ask you to do that?
	(ገ 'W	Vell, let me ask you to pay attention to the	2	A :	No.
2		٠ ۲	uestion and tell me what is it that you didn't	3	Q	Now, did you know Marilyn Figueroa well?
3		qı	destion and televis	4	Α	I knew Marilyn. I worked with her.
4			nderstand; okay?	5	0	Was she a nice person to you?
5	· /	A U	Okay.	6		Yes.
6		Q B	Because I notice he's slowly pushing you into	7	-	Was she respectful?
7		p.	olaying these games; okay. Go ahead.	8		To me? Yes.
8			(Question read)	9		Did you think she was a hard working person?
9) /	ΑI	don't know.	10	Δ	I don't know. She didn't do any work for me.
10	0 (Q D	Oid you ever tell Mr. Soika that you had already	1	Δ.	Did you, based on your observation, did you think
11	1	р	processed Marilyn Figueroa and placed her on medical	11	Ų	she was a hard working person?
12	2		eave?	12	٨	I really don't get into that. I'm in the clerical
13	3 /	ΑY	es, I told him.	13	А	section so I don't see what's going on.
14	4 (Q A	And when did you tell him that?	14	^	Do you know anyone who may have said negative things
- 15	5 /	ΑI	don't know.	15	Ų	Do you know anyone who may have said negative times
16	6 (QΙ	suspect it was after you had	16		about Ms. Figueroa while in your presence?
1			After.	17		No.
18			- done it?	18		After Marilyn Figueroa left
19		ÀΥ		19		Yes.
2			And what, if anything, did he tell you?	20	Q	the office, do you know if any records were
2	1 .	A I	don't remember.	21		destroyed, as you sit here telling me testimony
2	2	O A	After you processed this matter did Mr. Soika ever	22	_	under oath?
2	3	te	ell you to revoke?	23		I did not destroy any.
2	4	ΑΝ	No.	24		Do you know if anyone did?
2	5	0 S	So this went into the record as you had prepared it?	25	Α	I don't know.
-	•	Ψ -	65			67
1	1	Λ τ	t went into the record, and then Marie Pettigrew	1	0	Are you the person who has control of the personnel
1 1		A 11	called me and told me she could not process it	2	`	files? Are they kept within your jurisdiction?
			without the doctor's excuse.	3	Α	They're at my desk. They're not a locked file.
) 4	O 1	And when she told you that, what did you do?	4	Q	So anybody would have gotten into those files
4		Q F	I told Mr. Soika.	5	`	without your presence, outside your presence?
15			What did you tell him?	6	Α	I don't know.
		QV	l told him what Marie had told me, that it couldn't	7		When was the very first time that you learned that
		H I	be processed without the doctor's excuse.	8	`	Marilyn Figueroa was on medical leave?
	8			9		MR. TOKUS: Objection. That's not
- 1			And what did he say? I don't know.	10		the state of the record.
- I.	0	W-T	n don't know. Do you remember when you spoke to Mr. Soika about	11		MR. ARELLANO: Strike that.
- 1			-	12	0	That she was not coming back?
	2		that?	13	•	I don't know.
ı		A	No, no.	14		Did there come time when you learned that she was
		QI	Do you know when Ms. Pettigrew sent you that email?	15	~	not coming back?
			l believe she called me. I don't know.	16	Δ	No.
- 1	16	QI	What did she tell you?	17		Obviously you know now that she is not back?
- 11	17	A 5	She told me they could not process it without the	18		Yes.
			doctor's excuse.	110		
1	18			40	\sim) In that correct?
1	18 19	Q A	All right. Did you follow up on that with	19		Is that correct?
1 1 2	18 19 20	Q /	All right. Did you follow up on that with Marilyn Figueroa?	20	A	Right.
1 1 2	18 19	Q / 1 1 A	All right. Did you follow up on that with Marilyn Figueroa? No.	20 21	A	Right. You brought some records with you today.
1 2 2 2	18 19 20	Q / 1 1 A	All right. Did you follow up on that with Marilyn Figueroa?	20 21 22	A	Right. You brought some records with you today. (Exhibit No. 3 marked for
1 1 2 2 2	18 19 20 21	Q / 1 A 1 Q I	All right. Did you follow up on that with Marilyn Figueroa? No.	20 21 22 23	Ą	Right. You brought some records with you today. (Exhibit No. 3 marked for identification)
1 1 2 2 2 2 2 2 2	18 19 20 21 22	Q /A A A A A A A A A A A A A A A A A A A	All right. Did you follow up on that with Marilyn Figueroa? No. Did you send her an email or a letter?	20 21 22 23 24	Ą	Right. You brought some records with you today. (Exhibit No. 3 marked for identification) Let me show you what has been marked as
11 12 22 22 22 22 22 22 22 22 22 22 22 2	18 19 20 21 22 23	Q / A / A / A / A / A / A / A / A / A /	All right. Did you follow up on that with Marilyn Figueroa? No. Did you send her an email or a letter? Marilyn?	20 21 22 23	Ą	Right. You brought some records with you today. (Exhibit No. 3 marked for identification)

	e Compress Deposition of LATRION		MP ARELLANO And Lam reterring.
1	A They would be in the personnel file.	1	MR. ARELLANO: And I am referring, counsel, for your information to Exhibit No. 5
2	O And they meaning what? What are you referring to?	2	Counsel, for your information to Exhibit 140. 0
}	A It says produce a true and complete certified copy	3	which I would like to have before Mr. Hansen's
1	of personnel files of each and every supervisor that	4	deposition, which I believe should have been
	supervised the complainant during her employment as	5	submitted some time ago.
5	a staff assistant to Mayor John Norquist. Those	6	MR. TOKUS: You're entitled to your
3	a staff assistant to Mayor John Wordust. Those	7	belief, counsel.
7	should be there, all the personnel files.	8	Q Did you ever have any contact with employment
8	Q Including Mr. Soika's file?	9	relations regarding Marilyn Figueroa in any other
9	A Yes.		manner other than submitting this form which has
10	Q Okay, very good. We're getting there. We're moving	10	been marked as Exhibit No. 5?
11	to request No. 50 I believe you identified.	11	•
12	A 50? If I have any of these records pertaining to	12	A Yes.
13	Marilyn's leave, they would be in her personnel	13	Q Tell me the very first time that you had any
14	file. I think there might have been a letter, in	14	contacts with employment relations for the purposes
15	fact I think there's a letter terminating her	15	of discussing Marilyn Figueroa.
16	employment in there.	16	A I'm not sure of the very first time. I would say I
17	Q Very good. Thank you. Let me ask you, ma'am, did	17	probably contacted them to find out what I had to
	you place every email that you received from	18	do.
18	Mr. Soika regarding Marilyn Figueroa or anything	19	Q Tell me what did you do?
19	related to Marilyn Figueroa after January 4th in her	20	A Called employee relations. I don't know who I spoke
20	related to infamily trigueton after familiary and in the	21	with.
21	personnel file?	22	Q Okay.
22	A I don't know.	23	A And then I submitted this per instructions.
23	(Exhibit No. 4 marked for	24	Q I understand. Let's not move yet from the first
24	identification).	25	contact or the contact
25	MR. ARELLANO: Just so the record is 73	23	75
		1	A Okay. I'm not sure whether that was the first
1	clear as we approach a time to deal with	1 2	contact.
2	1	1 /	
	documents, I would request, counsel, that		
3	these forms that were processed by	3	Q Even though you may not remember the sequence
	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be	3 4	Q Even though you may not remember the sequence A Okay.
3	these forms that were processed by	3 4 5	Q Even though you may not remember the sequenceA Okay.Q I want to talk about the number of contacts that
3	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen.	3 4 5 6	Q Even though you may not remember the sequenceA Okay.Q I want to talk about the number of contacts that you had with employee relations. You have
3 4 5	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of	3 4 5 6 7	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee
3 4 5	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel?	3 4 5 6 7 8	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct?
3 4 5 6 7 8	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have	3 4 5 6 7	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall
3 4 5 6 7 8 9	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we	3 4 5 6 7 8	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done.
3 4 5 6 7 8 9	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the	3 4 5 6 7 8 9	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall
3 4 5 6 7 8 9 10	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm	3 4 5 6 7 8 9	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done.
3 4 5 6 7 8 9 10 11 12	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit.	3 4 5 6 7 8 9 10 11 12	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay.
3 4 5 6 7 8 9 10 11 12 13	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for	3 4 5 6 7 8 9 10 11 12 13	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact.
3 4 5 6 7 8 9 10 11 12 13	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification)	3 4 5 6 7 8 9 10 11 12 13	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done?
3 4 5 6 7 8 9 10 11 12 13 14	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as	3 4 5 6 7 8 9 10 11 12 13 14 15	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right.
3 4 5 6 7 8 9 10 11 12 13 14 15 16	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that	3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that Marilyn Figueroa was placed on unpaid medical leave	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know. Q Well then, what did you start doing?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that Marilyn Figueroa was placed on unpaid medical leave pursuant to Mr. Soika's direction?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know. Q Well then, what did you start doing? A Okay. I know I did this on the computer requesting
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that Marilyn Figueroa was placed on unpaid medical leave	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know. Q Well then, what did you start doing? A Okay. I know I did this on the computer requesting the family leave.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that Marilyn Figueroa was placed on unpaid medical leave pursuant to Mr. Soika's direction?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know. Q Well then, what did you start doing? A Okay. I know I did this on the computer requesting the family leave. Q You filled the family leave form?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that Marilyn Figueroa was placed on unpaid medical leave pursuant to Mr. Soika's direction? MR. TOKUS: Objection. That's not the state of the record.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know. Q Well then, what did you start doing? A Okay. I know I did this on the computer requesting the family leave. Q You filled the family leave form? A Yes.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	these forms that were processed by Ms. Stawicki regarding Marilyn Figueroa be produced tomorrow before the deposition of Mr. Hansen. MR. TOKUS: Which forms do you have in mind, counsel? MR. ARELLANO: The ones that we have been discussing with Ms. Stawicki, the form that she tried to process. In fact, I'm going to mark that as a separate exhibit. (Exhibit No. 5 marked for identification) Q Let me show you what has been marked as Exhibit No. 5 of your deposition, ma'am. Is that the form that we've been discussing, the form that you prepared and sent to the Department of Employment Relations indicating that Marilyn Figueroa was placed on unpaid medical leave pursuant to Mr. Soika's direction? MR. TOKUS: Objection. That's not	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q Even though you may not remember the sequence A Okay. Q I want to talk about the number of contacts that you had with employee relations. You have identified one contact when you called an employee from employee relations; correct? A I specifically recall I don't specifically recall that, but that's what I generally would have done. Q Tell me what you recall with respect to that A Okay. Q contact. A To the one that I think I might have done? Q Right. A I called DER. They told me what I had to do and I started to do it. Q What did they tell you to do? A I don't know. Q Well then, what did you start doing? A Okay. I know I did this on the computer requesting the family leave. Q You filled the family leave form? A Yes.

(608) 255-7700

Cas	se Compress Deposition of PATRIC			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
1	Mr. Soika informed you that Marilyn had requested	1	QS	So she had sick leave all the way to January 21st?
2	vacation?	2		Sick leave and vacation.
3	A No.	3		And vacation, okay. And then she ran out of sick
4	Q Did Mr. Soika ever report to you whether or not	4		leave on January 21st?
5	Marilyn had requested comp time?	5	Αſ	That's correct. She ran out of vacation and sick
6	A No.	6	1	leave. And after January 21st she was no longer on
7	Q All right, very good. Did Marilyn ever talk to you	7	1	the payroll, pay period three.
8	to request vacation after January 4th?	8	Q	January 22nd?
9	A No. 1 didn't have any contact with Marilyn.	9	Α	January 22nd was January 21st was her last day on
10	Q To your knowledge let me show you these records.	10		the payroll. She had 2.9 hours of time.
11	Was Marilyn Figueroa on vacation after January 4th	11	0	And so January 22nd?
	of the year 2000?	12	-	22nd is a Saturday.
12	A According to this record, for the pay period ending,	13		So she was terminated on that Saturday? That was
13	okay, after January 4th there were three days of	14	-	her last day?
14		15		Probably at the close of business on the 21st. I
15	vacation.	16		don't know.
16	Q For January 4th?	17		Did Mr. Soika ever tell you when she was supposed to
17	A No. January 5th, 6th and 7th were days of vacation. Q And then? Let's talk about the rest of the month.	18		be terminated?
18	And then? Let's talk about the rest of the month.	19		I believe there might have been a letter that he
19	A Pay period two, vacation January 10th, January 11th,	20		sent to her. I'm not positive.
20	7.6 hours on January 12th, then she went to sick	21		So from January 4th through January 21st Marilyn was
21	leave January 12th .4 of an hour, January 13th	22		enjoying the benefits that the City provides
22	and	23		pursuant to vacation and sick leave; correct?
23	Q Hold on a second. She went on sick leave on what	24		Correct.
24	date?	25		Now
25	A January 12th. The date that her vacation, 81	123	Q	83
1	01	- 1		30
			·····	
1	everything ended. I mean she didn't have any more	1	Α	There was one day in there oh, wait. From
1 2	vacation time. Then I put her on sick leave for .4	2	Α	January 4th I have that she worked. So starting the
	vacation time. Then I put her on sick leave for .4			January 4th I have that she worked. So starting the 5th of January.
2	everything ended. I mean she didn't have any more vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours.	2 3 4		January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working
2 3	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours.	2 3 4 5		January 4th I have that she worked. So starting the 5th of January.
3 4	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14?	2 3 4	Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes.
2 3 4 5	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours.	2 3 4 5	Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff?
2 3 4 5 6	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave.	2 3 4 5	Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded.
2 3 4 5 6 7 8	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours.	2 3 4 5 6 7	Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff?
2 3 4 5 6 7 8 9	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours.	2 3 4 5 6 7 8	Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes.
2 3 4 5 6 7 8 9	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th.	2 3 4 5 6 7 8 9	Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll
2 3 4 5 6 7 8 9 10	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th.	2 3 4 5 6 7 8 9	Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes.
2 3 4 5 6 7 8 9 10 11 12	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th.	2 3 4 5 6 7 8 9 10	Q A Q A Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time?
2 3 4 5 6 7 8 9 10 11 12 13	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave	2 3 4 5 6 7 8 9 10 11 12	Q A Q A Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of
2 3 4 5 6 7 8 9 10 11 12 13 14	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th.	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And	2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q A Q	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one? Q An employee can only take sick leave if they are	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And So how do they take comp time when they do?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one? Q An employee can only take sick leave if they are entitled to that; correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And So how do they take comp time when they do? When they need time, they would go into their
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one? Q An employee can only take sick leave if they are entitled to that; correct? A Correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And So how do they take comp time when they do? When they need time, they would go into their superior and request time. And he would, he or she
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one? Q An employee can only take sick leave if they are entitled to that; correct? A Correct. Q So the dates that you gave me for sick leave, those	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And So how do they take comp time when they do? When they need time, they would go into their superior and request time. And he would, he or she would say okay. And then at that point they would
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one? Q An employee can only take sick leave if they are entitled to that; correct? A Correct. Q So the dates that you gave me for sick leave, those dates she was entitled to take sick leave?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And So how do they take comp time when they do? When they need time, they would go into their superior and request time. And he would, he or she would say okay. And then at that point they would tell me I'm going to mark eight hours for, that I
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	vacation time. Then I put her on sick leave for .4 of an hour on January 12th to make up the eight-hour day. Than 13th and January 14th each eight hours. Q Hold on. January 13 and January 14? A Yes, sick leave. Q Sick leave. A Both eight hours. Q That she was entitled to? A Yes. There was a holiday January 17th. Q Hold on. Holiday January 17th. A Which was Martin Luther King Day. Then sick leave on the 18th, sick leave Q Hold on, 18th. A Sick leave on the 19th, sick leave on the 20th. And 2.9 of an hour sick leave on the 21st of January. And that was her last day on the payroll. Q Let's go back to that. Let's go back to that. A This one? Q An employee can only take sick leave if they are entitled to that; correct? A Correct. Q So the dates that you gave me for sick leave, those	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A	January 4th I have that she worked. So starting the 5th of January. During all of the years that you have been working for Mayor Norquist's administration Yes. was comp time ever used by any of the staff? It never was recorded. But it was used as a matter of practice? Yes. And how would you in your difficult job in payroll in time record keeping, how would you keep track of comp time? I did not keep track of their comp time. Who would be required to keep track of comp time? I don't think anyone. The employees would? Their job is different. They work nights, sometimes weekends. They accompany the Mayor. And So how do they take comp time when they do? When they need time, they would go into their superior and request time. And he would, he or she would say okay. And then at that point they would

Cas	se comprese	THE WITNESS: Unless somehody else
1	A Correct, vacation time.	1 THE WITNESS: Unless somebody else
2	Q She was on vacation time?	2 needs a break.
3	A Yes.	3 MR. ARELLANO: I can see it in your
4	Q Again, do you recall if he reminded you of any	4 eyes. Don't use me as a reason to take a
5	specific conditions or limitations?	5 break. I'm ready to go. All right. Very
6	A No, he did not.	6 good.
7	Q All right, good. Then she was placed on sick leave	7 THE WITNESS: I'd rather get it
8	I believe on January 4th for I believe some time.	8 over with.
9	A January 4th? No.	9 Q Now, the records that you have in front of you,
	Q Excuse me, January 12th. Is that correct?	10 let's go to the package that you produced today
10	A January 12th for .4 of an hour.	11 which I believe has been marked as Exhibit
11	Q And then again on January 13th, 14th; is that	12 A I don't think that's the whole package. That's just
12	correct?	13 clerical.
13		14 Q Don't be scared. Your only duty
14	A Uh-huh, correct.	15 A I know.
15	Q Sick leave; true?	16 Q Your only duty is to the sworn record, not to any
16	A Yes. Q Did he impose any conditions or limitations?	other politician. Now, the record that you produced
17		does not contain the entire record; is that correct?
18	A No. Q Did he give you any special instructions?	19 A This is only the clerical. There should be other
19		20 records there that I I don't know, do you have
20	A No. Q And then on January 17th?	21 the other ones?
21	A Was a holiday. I gave her eight hours pay.	22 Q While you're on the record, you can only talk to the
22	A was a nonday. I gave her eight hours pay.	23 record; all right?
23	Q So she was allowed to do that?	24 A I'm sorry. There were other records. They're not
24	A Yes. Q January 18th, 19th, and 20th?	25 here.
25	89	91
1		
,		4 O. D
1	A Eight hours each day.	1 Q Records that belong to who?
2	A Eight hours each day. Q Of sick leave?	2 A To the staff, staff assistants and the Mayor's
	A Eight hours each day. Q Of sick leave? A Right.	2 A To the staff, staff assistants and the Mayor's staff.
2 3 4	A Eight hours each day.Q Of sick leave?A Right.Q Any special instructions or conditions?	 2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you?
2 3 4 5	 A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. 	 2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except
2 3 4 5 6	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick	 2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except this piece of paper.
2 3 4 5 6 7	 A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? 	 2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except this piece of paper. 7 Q Were you asked to produce any records for today?
2 3 4 5 6 7 8	 A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. 	 2 A To the staff, staff assistants and the Mayor's staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here.
2 3 4 5 6 7 8 9	 A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did 	 2 A To the staff, staff assistants and the Mayor's staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any
2 3 4 5 6 7 8 9	 A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you 	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus?
2 3 4 5 6 7 8 9 10	 A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? 	2 A To the staff, staff assistants and the Mayor's staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any additional records for me today, Mr. Tokus? 10 MR. TOKUS: No. You have all of
2 3 4 5 6 7 8 9 10 11	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one.	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano.
2 3 4 5 6 7 8 9 10 11 12 13	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object
2 3 4 5 6 7 8 9 10 11 12 13 14	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies?	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me.	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated?	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so.	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so. Q Okay, very good.	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving 20 you an opportunity to review those records, tell me,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so. Q Okay, very good. MR. ARELLANO: Let's take a couple	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving 20 you an opportunity to review those records, tell me, 21 can you identify those records for
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so. Q Okay, very good. MR. ARELLANO: Let's take a couple minutes break. Would you like a little break?	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving 20 you an opportunity to review those records, tell me, 21 can you identify those records for 22 A Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so. Q Okay, very good. MR. ARELLANO: Let's take a couple minutes break. Would you like a little break? THE WITNESS: No.	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving 20 you an opportunity to review those records, tell me, 21 can you identify those records for 22 A Yes. 23 Q the record?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so. Q Okay, very good. MR. ARELLANO: Let's take a couple minutes break. Would you like a little break? THE WITNESS: No. MR. ARELLANO: Do you want to	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving 20 you an opportunity to review those records, tell me, 21 can you identify those records for 22 A Yes. 23 Q the record? 24 A Yes. They're Marilyn Figueroa's payroll records.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Eight hours each day. Q Of sick leave? A Right. Q Any special instructions or conditions? A No, no. Q And then January 21st was her last day of sick leave? A She put in or she had coming to her 2.9 hours. Q During this entire period, Ms. Stawicki, did Mr. Soika or anyone in the Mayor's office give you any status report of Marilyn Figueroa? A I don't recall one. Q During this entire period did anyone ever tell you to obtain from Marilyn Figueroa any specific forms in order to be in compliance with City policies? A I don't recall them telling me. Q Did anyone report to you the status of her medical leave before she was terminated? A I don't think so. Q Okay, very good. MR. ARELLANO: Let's take a couple minutes break. Would you like a little break? THE WITNESS: No. MR. ARELLANO: No? Do you want to	2 A To the staff, staff assistants and the Mayor's 3 staff. 4 Q And you did not bring those with you? 5 A I didn't bring anything personally with me except 6 this piece of paper. 7 Q Were you asked to produce any records for today? 8 A Yeah. I thought they were going to be here. 9 MR. ARELLANO: Do you have any 10 additional records for me today, Mr. Tokus? 11 MR. TOKUS: No. You have all of 12 them, Mr. Arellano. 13 MR. ARELLANO: I certainly object 14 to such characterization, but we'll get to 15 that. 16 (Exhibit No. 7 marked for 17 identification) 18 Q Let me show you what has been marked as 19 Exhibit No. 7 of your deposition. And after giving 20 you an opportunity to review those records, tell me, 21 can you identify those records for 22 A Yes. 23 Q the record?

	Case	Со	mpress Deposition of PATRICI			11.1 that Ilive been with the Mayor's
Γ			Vhat would they show?	1	Α	In all the years that I've been with the Mayor's
1		י ע ר מ	They would show it would be a sheet like this	2		office, because of the fact that people work on and
1		Λ .i	hat would show vacation, sick leave. This goes	3		off their overtime hours, let's call them
	3	i.	nand in hand with this.	4		compensatory time, I've never had anybody turn in a
)	4	r	Nand III Italiu with this.	5		slip that they were sick or has I don't think
			With that. Very good, excellent.	6		anyone ever requested one of them. To be quite
-	6	Α (Correct.	7		frank with you, most of our people aren't sick.
		-	'm learning. Do you know if when someone calls	8	0	They just take sick leave?
	8		ill	9	À	No. They take maybe three days a year. Most people
	9	Α `	Yes.	10		do.
			is the practice to record what type of illness?	11	Ο	You mentioned that there were some changes with
į	11		I don't.	12	V	respect to the sick leave
	12	Q	Do you	13	Δ	Uh-huh.
	13	Α		14		within the Mayor's office?
	14	Q	Do you know if anyone does?		V A	No. Within the whole City system.
	15	Α	I don't know that.	15		
	16		So if I were to ask you do you know what kind of	16	_	The policy?
	17		illness was affecting	17		Yes.
	18	Α	I would not know.	18		When did that change take place?
	19	Q	You've got to we're doing fine but and she	19		I don't know.
	20		knows because she's quite good, but we are talking	20	,	What year?
	21		at the same time sometimes.	21		I don't know.
	22	Α	l'm sorry.	22		Was it what was the policy in 1999?
	23	0	That's fine. For this now obviously if somebody	23	Α	I believe it was after three days.
	24	-	were to request family leave or be forced to produce	24	Ç	Then you needed a medical authorization?
	25		medical authorization, you would know; right?	25	Α	I don't know if it was mandatory. Let's put it that
			97			99
	1		At some point someone should tell me.	1		way. It no longer I think you were supposed to
	1	Α .	All right. And obviously you would make that part	2		bring one in, but it was no longer required to be
	2	Ų	of the personnel file?	3		sent up to employee relations. It was just for the
	3	٨	Yes.	4		department.
	4	^	Do you recall, Ms. Stawicki, whether or not Marilyn	5	(So the policy of producing a medical authorization
	5	Ų	produced any medical authorization for those five	6		never changed; the only thing that changed was not
	6		•	7		sending it to the employment relations department?
	7	۸	days? I don't know.	8	P	A Correct.
	8	Α	What is your understanding of the medical of the	9		Put in essence, the requirement remained the same?
	9	Q	medical leave policy for the City of Milwaukee? At	10		After three days you were supposed to bring one?
	10		what point are they required to produce medical	11		Correct, correct.
	111			12		Q Very good.
	12	٨	absence? It used to be at the discretion of the department	13		A The only thing that changed was previous to a
	13	А	head and after, if you wanted if the department	14		certain year, and I don't know which year it was, it
	14		head required it after three days, you filled we	15		was at the discretion of the department head to ask
	15		head required it after times days, you miss a we	16		for this.
	16		had to bring in a slip from your doctor stating the	17		Q In 1999 who was the chief of staff for the Mayor's
	17		reason why you were sick. And it got sent up to the	18		office?
	18		Department of Employee Relations.	19		A I don't know. I'm sorry.
	19		Now I think it probably is that after three	20		Q Are you sure you don't need a break?
	20		days you bring in a slip, but it no longer goes up	21	, '	A Maybe I do need a break. He went up to DOA. I can
	21		to Department of Employee Relations. It's kept in	22		picture him and I can't think.
	22		the person's file.			
	23		And is that the practice of the Mayor's office?	23		Q Was it Mr. Soika?
!	24		Not always.	24		A Well, it might have been Mr. Soika.
	25	Q	It's not consistent?	25)	Q Was it Mr. Rowen?
	1		98	1		100

p	han three days of sick leave they are required to provide a medical authorization, even though it has	1 2	Q I	Do you recall approximately when you spoke to Mr. Soika?
p	provide a medical authorization, even though it has	2]	Mr. Soika?
r	* * * · · · · ·		_	
	not been applied?	3		No, I don't.
•	MR. TOKUS: Did you understand the	4	Q I	Do you recall what Mr. Soika said?
	question?	5		I believe he told me to call Jeff Hansen.
	THE WITNESS: No, I don't.	6	Q	And did you do that?
Ο I	Let me ask you that question again. My	7	À	Yes, I did.
Q I	understanding is, based on your sworn testimony	8	0	What did you tell him?
		9	À	I told him exactly what Marie Pettigrew had told me,
	here	10	-	which was I needed a doctor's excuse and that
A	Yes.	11		Marilyn had said she was going to send it but I had
Q.	that the policy and practice of the Mayor's	12		not received it. And he said I'll take care of the
1	office and the City of Milwaukee is to request a	13		matter. He said, if anyone questions you, tell them
	medical authorization every time somebody takes more	14		to contact me.
	than three days of sick leave. Is that correct?	15	Ω	Is that all Mr. Hansen said to you?
Α	I believe it is.	16		I believe so.
	MR. ARELLANO: Let's take a break.	17		Did you write any notes with respect to your
	(Recess for lunch)	18	Y	communication with Mr. Hansen?
Ву	Mr. Arellano:	19	٨	Yes.
Q	By looking at Marilyn Figueroa's personnel file, are			What did you do?
	you able to tell me whether or not there is in that	20		I told Mike Soika what he had said.
	file any medical authorization filed by	21		
	Marilyn Figueroa or any doctor?	22	Q	Did you send how did you notify Mr. Soika? I can't remember if it was in writing or verbal.
Α	Do you want me to look through it?	23	A	Did you have any further contacts with Mr. Hansen?
Q	Yes.	24	Q	Did you have any further contacts with wir. Hansen:
Α	Can I take this?	25	А	I don't think so. Not after that time. 107
	105			
0	Sure, sure.	1	Q	Did you have any further contacts with anyone from
À	This might take a little while.	2		employee relations?
0		3		I don't think so.
`	(Exhibit Nos. 8 and 9 marked for	4	· Q	When Mr. Hansen told you that he would take care of
	identification)	5		it, what did you understand he was telling you?
	(Witness looking at exhibit)	6	Α	He would handle the matter. That I thought he was
Α	I don't see any.	7		going to talk to Marie and say just keep it on the
Q	All right. And you have reviewed Marilyn Figueroa's	8		books because this medical excuse is coming through.
	personnel file; correct?	9		That's what my assumption was.
	I looked through it, yes.	10	Q	Obviously you felt that he would take care of it?
1 Q	As you looked through that personnel file, did you	11	Α	Yes.
2	see any records missing that you would identify as	12	Q	He never told you anything else than what you just
		13		told me?
		14	Α	Not to my knowledge.
т Л 5 О	Okay Now you can put it back together. Now, when	15	C	You didn't feel he was denying the medical leave by
	you were notified by employer relations or employee			virtue of his
	rolations that you could not process			
	Marilyn Rigueroa's medical leave until she received		(In fact, you felt comfortable that he would process
	a medical or doctor's release did you report that	•		
		1		MR. TOKUS: Objection, that's not
			Δ	
	What did you tell him?	23		On you know if it was ever taken care of?
23 A	A I told him that I had tried to process it and I was	24		A I don't know.
				3 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
24 25	told that Marilyn had to submit a doctor's excuse before DER could go ahead.	25		During from January 4th until Marilyn was
3 4 A 5 Q 6 7 8 9	missing? I don't think so. Okay. Now you can put it back together. Now, when you were notified by employer relations or employee relations that you could not process Marilyn Figueroa's medical leave until she received a medical or doctor's release, did you report that to Mr. Soika? Yes.	13 14	A Q A	told me? Not to my knowledge. You didn't feel he was denying the medication virtue of his Jeff? No. He didn't say he would deny it. In fact, you felt comfortable that he would the rest?

3

7

8

18

25

2

7

8

10

18

10

11

12

13

14

15

16

17

18

19

Case Compress told you, I mean what I say. Don't let him portray me as not being genuine. I would tell you he knows 2 that. When a witness is not telling you the truth, 3 they'll know it because I'll let them know. You wrote on this document Exhibit No. 817 5 days. Are you able to tell me what's the 6 7 significance? 8 A I have no idea.

Q And obviously the information that you received in this exhibit, when you wrote on this Exhibit No. 8 established at least for your knowledge that assuming Marilyn Figueroa would have been granted medical leave, she would have been entitled to 12 weeks and not six as you stated before; correct?

MR. TOKUS: Objection. That's not the state of the record.

Q All right. Whatever. On top of that Exhibit No. 8 on the left margin, can you read to me what that first sentence states way at the top, left margin?

20 A Left margin?

21 Q On top.

22 A Here?

23 O Next. Down.

A "Entitled to 12 weeks of unpaid leave." 24

Q Is that what they explained to you from employment 25

Q Did I read that correctly?

A Yes, it's on there, correct. 2

Q And did you give Mr. Soika a copy of this memo,

4 ma'am? 5

A I do not know. Q Did you notify Mr. Soika that if no medical 6

statement would be forthcoming, a form CBP 129 would be required if she were to be --

9 A I do not know.

Q Did you ever send Marilyn Figueroa form CBP 129? 10

A I don't recall sending Marilyn anything, but I'm not 11

positive. 12

Q Have you ever seen a form CBP 129? 13

A I don't know what it is, but I'm sure I've seen one. 14

Q What does it contain? 15

A I don't know. 16

Q I suspect the purpose is to obtain information? 17

A It's probably just a request for a regular leave of

19

Q And that would be another thing that would fall 20

21 within your --

22

Q -- the purview of your responsibilities; correct? 23

24 A Uh-huh.

MR. TOKUS: You're going to have to

115

relations?

A I would say yes, but I'm not positive. 2

Q But you are positive of what you wrote; correct? 3

4 A About due --

Q And that is the 12 weeks up here? 5

A Oh, yes, it says that, yes. 6

Q And this information, this information that you 7 obtained as you were trying to determine 8

Marilyn Figueroa's status with the City; correct? 9

10 A I believe so.

Q All right. They also told you that Marilyn Figueroa 11 would have been entitled to be placed on regular

12 leave of absence if the doctor's statement was not 13

issued. Did I read that correctly? 14

A If the doctor's statement is not issued, the 15

employee must request a regular leave of absence.

That's what's on there. 17

Q So that would be another option Marilyn Figueroa 18

would have had under City policies; correct?

A It would seem like that. 20

Q All right. And you also wrote pursuant to your 21

discussion with employment relations that, on the 22 second paragraph last sentence, "On a regular leave 23

of absence, a form CBP 129 must be filled out." 24

25 A Okay.

16

19

let him finish before you answer. 1

Q You are fine. Do you have any information as to

whether or not Mr. Soika ever, was ever notified 3 that Marilyn had given a medical leave authorization 4

5 to the Mayor's attorney, Anne Shindell?

A I know nothing of that.

6 Q Let me represent to you, Ms. Stawicki, that

Mr. Soika testified under oath that after

9 Marilyn Figueroa was terminated he learned that her

doctor had issued a medical authorization on

January 21st. Did he ever tell you that? 11

12

Q To this date did Mr. Soika ever disclose to you that 13

Anne Shindell, the Mayor's attorney, had received a 14 15

medical release from Marilyn's doctor?

A I don't believe so. 16

Q If that medical release would have been received by 17

you, what would have been the next step for you to

19 do?

A I would have taken it to Mr. Soika if it was 20

addressed to me and I would have showed him.

21 Q But as far as requesting the medical leave, you 22 23

would have completed --

24 A Yes.

Q -- the medical leave and sent it to employment 25

C:	ase Compr	Deposition of PATRICIA	· ^ ·	21/	AVVICATION 14702
	O Ic tha	t an accurate representation of what happened?		Q.	And just so we can help you to understand when you
1	A Anfor	r as I know.	2		typed this record, you must have typed this record
2	A Asiai	Now, on January 27, going back to the first	3		after January 27th by virtue of the fact that you
3	Q Okay	nce, you had placed Marilyn on unpaid family	4		wrote it after that date; correct?
4	sente	nce, you nau placed Marry to on despute the	5	Α	It could have been January 27th.
5	leave	; is that correct?	6	0	Not before obviously?
6	A Acco	rding to here, to the paper.	7	À	I don't know.
7	Q Right	t. And I suspect you placed her on family leave	8	$\hat{0}$	Very interesting. Let me show you now what has been
8	on Ja	nuary 27th at the direction of Mr. Soika?	9	V	marked as Exhibit No. 4 and I'll trade with you.
9	Corre	ect?	10		Are you familiar with this?
10	A I wou	uld say so.		٨	Looks like an email from Mike Soika to me.
111	Q Well,	, he is the one who would have to approve it;	11		Did you receive it?
12	true?)	12		I don't know.
13	Δ Lwo	uldn't place her on that myself.	13		
14	O That'	's what I'm saying. Mr. Soika told you to place	14	Ň	By reading the contents?
15	her o	on family leave on January 27th; correct?	15	А	I would say by reading the contents I did receive
16	A Idor	a't know about the date.	16	_	it.
17	O Lunc	derstand that. But what you're telling me here	17		It refreshes your recollection; correct?
18	unde	er path is that what you wrote here is factually	18	Α	Yes.
19	corre	ect based on what you know happened; true?	19	Q	Now, let me take a look at that. Here again you
20		, , , , , , , , , , , , , , , , , , , ,	20		would agree with me, would you not, that Mr. Soika
21	O How	v soon after January 27th did you talk to	21		was advised by Mr. Hansen to place Marilyn Figueroa
22) Q 110 W) Mari	ie Pettigrew?	22		on medical unpaid leave; is that correct? Read it
23	Nian A Itan	ust have been the same day or the day after	23		carefully.
) A lillii	use Marie then checks the screens, the computer	24		(Witness looking at document)
24		ens and she called me.	25	Q	Is that accurate? Do you want the question read
2) SCIE	121			123
			1		back again?
) 1	Q So a	t what point did you talk to Jeff Hansen about	2	Δ	No.
2	Mar	ilyn Figueroa being on medical leave?	3		Is your answer yes?
3	A 1 car	n't be sure about the exact date. It was after	4	_	Yes.
4	I tall	ked to Marie and Mike Soika.	5		And at the bottom of that particular email which has
5		my question is did you talk to Mr. Hansen the	1		
	Q But	. 1 (1 Lalked to Mc Petharew/	וה	~	hoop marked as Fyhibit No. 4. I believe Mr. Soika
6	next	t day after you talked to Ms. Pettigrew?	6	V	been marked as Exhibit No. 4, I believe Mr. Soika
1	next Aldo	n't know. It might have been the same day. I	7	~	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding
- 1	next Aldo don	n't know. It might have been the same day. I 't know.	7 8		been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct?
7	next Aldo don	n't know. It might have been the same day. I	7 8 9	Α	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct?
8	next Aldo don QWel ANo.	on't know. It might have been the same day. I I't know. II, do you remember the time when I don't.	7 8 9 10	Α	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen
8	7 A I do 8 don 9 Q Wel 0 A No, 1 O Hol	on't know. It might have been the same day. I I't know. II, do you remember the time when I don't. Id on a second. Let me finish my question. Do	7 8 9 10 11	A	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa?
1	7 A I do 8 don 9 Q Wel 0 A No, 1 O Hol	on't know. It might have been the same day. I I't know. II, do you remember the time when I don't. Id on a second. Let me finish my question. Do	7 8 9 10 11 12	A	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did.
1 1 1	next A I do A I do C Q Wel A No, C Q Hol C you	on't know. It might have been the same day. It know. It know. Il, do you remember the time when I don't. Id on a second. Let me finish my question. Do I remember the time when you talked to	7 8 9 10 11 12 13	A (been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do?
1 1 1 1	next A I do A I do A Q Wel A No, A Q Hol A No A Mai A No,	on't know. It might have been the same day. It know. It know. It, do you remember the time when I don't. Id on a second. Let me finish my question. Do a remember the time when you talked to rie Pettigrew? I don't.	7 8 9 10 11 12 13 14	A (been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I
7 8 9 1 1 1 1	next A I do A I do A Vel A No, A Vel A No, A Mai A No,	on't know. It might have been the same day. It know. It know. It, do you remember the time when I don't. Id on a second. Let me finish my question. Do a remember the time when you talked to rie Pettigrew? I don't.	7 8 9 10 11 12 13 14 15	A () A	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff.
1 1 1 1 1 1	next A I do A I do A No, A A No,	on't know. It might have been the same day. It know. It know. It do you remember the time when I don't. Id on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I don't. I don't. I don't. I don't know.	7 8 9 10 11 12 13 14 15 16	A () A	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any
1 1 1 1 1 1 1 1 1	next A I do A I do A No, A A No,	on't know. It might have been the same day. It know. It know. It do you remember the time when I don't. Id on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I don't. I don't. I don't. I don't know.	7 8 9 10 11 12 13 14 15 16	A () A	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen?
11 11 11 11 11 11	next A I do A I do A No, C Hol C You A No, C Hol C You A No, C Was A No, C Q Was A I do C O Do	on't know. It might have been the same day. It know. Il, do you remember the time when I don't. Id on a second. Let me finish my question. Do a remember the time when you talked to rie Pettigrew? I don't. Is it in the morning, before lunch, after lunch? I don't know. I don't when you talked to Mr. Hansen, in the	7 8 9 10 11 12 13 14 15 16 17 18	A () A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so.
7 8 9 11 11 11 11 11	next A I do A I do A No, A Vel A No, A No, A No, A No, A No, A I do A No, A I do	on't know. It might have been the same day. It know. It know. It don't. It don't. It on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I don't know.	7 8 9 10 11 12 13 14 15 16 17 18	A () A () () A () () A () () A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind?
7 8 9 1 1 1 1 1 1	next A I do A I do A No, A Vel A No, A No, A No, A No, A No, A I do A No, A I do	on't know. It might have been the same day. It know. It know. It don't. It don't. It on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I don't know.	7 8 9 10 11 12 13 14 15 16 17 18	A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct.
11 11 11 11 11 11 11 11 11 11 11 11 11	7 A I do 8 don 9 Q Wel 0 A No, 1 Q Hol 2 you 3 Mai 4 A No, 5 Q Wai 6 A I do 7 Q Do 8 moi	on't know. It might have been the same day. It know. It know. It don't. It don't. It on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I don't know. I fine when you talked to Mr. Hansen, in the rning or in the afternoon? I don't know. I fine follow the sequence of your memory, it is	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct. All right, very good. Up to that point,
77 8 9 9 1 1 1 1 1 1 1 1 1 1 1 1 2 2 2	next A I do A I do A No, C Wel A No, C Was A No, C Q Was A I do C Q Do C B mos	on't know. It might have been the same day. It know. It know. It don't. It don't. It on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. Is it in the morning, before lunch, after lunch? I don't know. I	7 8 9 10 11 12 13 14 15 16 17 18 19 20	A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct. All right, very good. Up to that point, Ms. Stawicki, did you have a sense that this was a
77 88 99 11 11 11 11 11 11 12 22 22	next A I do A I do A No, C Wel A No, C Wal A No, C Wal A No, C Q Wal A No, C Q Wal C Q Do C B Moi C Q But C C C C C C C C C C C C C C C C C C C	on't know. It might have been the same day. It know. It know. It don't. It don't. It on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I d	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct. All right, very good. Up to that point, Ms. Stawicki, did you have a sense that this was a rather touchy matter by virtue of the people that
77 88 99 11 11 11 11 11 11 11 11 11 11 11 11	next A I do A I do A No, C Wel A No, C Wal A No, C Wal A No, C Q Wal A No, C Q Wal C Q But C Q But C Q A Co C A Co	on't know. It might have been the same day. It know. It know. It don't. Id on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. I	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A () A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct. All right, very good. Up to that point, Ms. Stawicki, did you have a sense that this was a rather touchy matter by virtue of the people that were involved and how it was being handled?
77 8 8 9 11 11 11 11 11 11 12 22 22 22 22 22 22 2	Maria A I do don don don don don don don don don	on't know. It might have been the same day. It know. It know. It, do you remember the time when I don't. Id on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. Is it in the morning, before lunch, after lunch? On't know. You recall when you talked to Mr. Hansen, in the rning or in the afternoon? On't know. If we follow the sequence of your memory, it is ar that you spoke to Mr. Hansen after you spoke Marie Pettigrew? Trect. I Mr. Soika; correct?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A () A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct. All right, very good. Up to that point, Ms. Stawicki, did you have a sense that this was a rather touchy matter by virtue of the people that were involved and how it was being handled?
77 8 8 9 11 11 11 11 11 11 12 22 22 22 22 22 22 2	next A I do A I do A No, C Wel A No, C Wal A No, C Wal A No, C Q Wal A No, C Q Wal C Q But C Q But C Q A Co C A Co	on't know. It might have been the same day. It know. It know. It, do you remember the time when I don't. Id on a second. Let me finish my question. Do remember the time when you talked to rie Pettigrew? I don't. Is it in the morning, before lunch, after lunch? On't know. You recall when you talked to Mr. Hansen, in the rning or in the afternoon? On't know. If we follow the sequence of your memory, it is ar that you spoke to Mr. Hansen after you spoke Marie Pettigrew? Trect. I Mr. Soika; correct?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A () A ()	been marked as Exhibit No. 4, I believe Mr. Soika directs you to refer any questions regarding Marilyn Figueroa to Mr. Hansen; is that correct? Right. Did you ever direct any questions to Mr. Hansen regarding Marilyn Figueroa? Yes, I did. What did you do? After, I believe after Marie Pettigrew called me I called Jeff. Is that the only time when you referred any questions to Mr. Hansen? I can't be sure but I think so. That's the only one that is in your mind? That I can correct. All right, very good. Up to that point, Ms. Stawicki, did you have a sense that this was a rather touchy matter by virtue of the people that

	Case	e Co	ompress Deposition of PATRICIA			
Γ	1	Α,	Yes.	1	Α	Yes.
-	2	0	All right. Were there some years when she was	2	Q	Did you ever see the two of them together, other
1	3	Ψ.	moodier than others?	3		than working
-	J	Λ	I wouldn't say it went in years. It went in days.	4	Α	In the office? Never.
) [^	Some days she would be fine. Other days she would	5	Q	When people went to see the Mayor, are they required
	5			6	`	to sign in and sign out?
1	6		be a little sad.	7	Α	Let me think about that. At one time we had a guest
- [7	Q	I suspect your recollection of Marilyn is fresher in	8	,,	book where they did sign in and out. I don't
-	8		1999 than it would be in 1995?	9		believe that's the practice now.
	9		I don't know that.		0	When did that practice stop?
	10	Q	Your mind works backwards?	10	V	I don't know. You'd have to ask the receptionist.
	11	Α	No.	11	А	
	12		MR. TOKUS: Objection.	12	_	I don't know.
	13	0	I just want to understand you because you're	13	Q	Okay, I will. Did you have contact with
	14	`	telling so your recollection of her moodiness,	14		Mayor Norquist on a daily basis?
	15		did that did you observe that in 1999?	15	Α	Not on a daily basis. I would see him coming into
	16		I can't say for sure.	16		the office or leaving the office. Sometimes I
	17		Well, what about	17		didn't see him at all.
	18		I would	18	Q	If Marilyn or the Mayor were to testify strike
	19		Go ahead. You would say?	19		that. If Marilyn were to testify that the Mayor
	20		Probably, probably.	20		summoned her into the office on a weekend to engage
	21		What about 1998?	21		in sexual acts, do you believe Marilyn would be
		•	l don't know.	22		lying?
	22			23	Α	I don't know what I would believe.
	23		You don't recall that year?	24	0	Would you have any reason to believe that she would
	24		No.	25	~	lie?
	25	Ų	What about 1997? 129			.131
			12.5			
				+ -		
)	1	Α	I can't recall what year.	1		No.
	1 2	A Q	I can't recall what year.	2) Have you ever heard, do you have any experience
	1		I can't recall what year.	2 3	Ç	Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you?
	2		I can't recall what year.	3 4	(A	Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so.
	2 3	Q	I can't recall what year.	2 3 4 5	(A	Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any
	2 3 4 5	Q	I can't recall what year.	2 3 4 5 6	ς Α	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you?
	2 3 4 5 6	Q A	I can't recall what year.	2 3 4 5 6 7	ς Α	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It
	2 3 4 5 6 7	Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and	2 3 4 5 6	ς Α	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came
	2 3 4 5 6 7 8	Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000?	2 3 4 5 6 7	ς Α	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just
	2 3 4 5 6 7 8 9	Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I	2 3 4 5 6 7 8	ς Α	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business
	2 3 4 5 6 7 8 9	Q A Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor?	2 3 4 5 6 7 8 9	ς Α	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just
	2 3 4 5 6 7 8 9	Q A Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working	2 3 4 5 6 7 8 9	C A	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I
	2 3 4 5 6 7 8 9 10 11	Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot.	2 3 4 5 6 7 8 9 10	C A	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women.
	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel	2 3 4 5 6 7 8 9 10 11 12	()	 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I
	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor?	2 3 4 5 6 7 8 9 10 11 12 13		 Have you ever heard, do you have any experience
	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so.	2 3 4 5 6 7 8 9 10 11 12 13		 Have you ever heard, do you have any experience
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that	2 3 4 5 6 7 8 9 10 11 12 13 14 15		Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I I promise to stop that practice in my office. Okay.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I Q I promise to stop that practice in my office. A Okay. Q There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? A Yes.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I I promise to stop that practice in my office. Okay. There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? Yes. Other than you mean she would hug men and women
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I I promise to stop that practice in my office. Okay. There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? Yes. Other than you mean she would hug men and women alike?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned that there were some rumors about Mayor Norquist and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		 Have you ever heard, do you have any experience
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned that there were some rumors about Mayor Norquist and Marilyn Figueroa?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I Q I promise to stop that practice in my office. Okay. Q There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? Yes. Q Other than you mean she would hug men and women alike? A Sometimes it would be a woman, she'd come in and she'd hug her. Sometimes it was a man, you know,
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned that there were some rumors about Mayor Norquist and Marilyn Figueroa? I can't name an exact date.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I Q I promise to stop that practice in my office. Okay. There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? Yes. Other than you mean she would hug men and women alike? Sometimes it would be a woman, she'd come in and she'd hug her. Sometimes it was a man, you know, right out in the open. And I just thought this
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned that there were some rumors about Mayor Norquist and Marilyn Figueroa? I can't name an exact date. Was it before she left or after?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I I promise to stop that practice in my office. Okay. There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? Yes. Other than you mean she would hug men and women alike? Sometimes it would be a woman, she'd come in and she'd hug her. Sometimes it was a man, you know, right out in the open. And I just thought this is well, I'm sure she knew the people and they
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned that there were some rumors about Mayor Norquist and Marilyn Figueroa? I can't name an exact date. Was it before she left or after? Before.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		 Have you ever heard, do you have any experience
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A Q A	I can't recall what year. Did you ever hear any rumors about Ms. Figueroa and Mayor Norquist before January 4th of 2000? No. I don't think I Did Marilyn ever complain to you about the Mayor? She never said anything other than she was working too hard. He expected a lot. Did she ever tell you that she didn't feel comfortable around the Mayor? I don't believe so. Do you recall any one time when she said to you that she didn't want to be alone with the Mayor? She never told me that. No? When was the very first time that you learned that there were some rumors about Mayor Norquist and Marilyn Figueroa? I can't name an exact date. Was it before she left or after?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		 Have you ever heard, do you have any experience strike that. Has Marilyn Figueroa ever lied to you? I don't believe so. Have you ever seen Marilyn Figueroa act in any promiscuous manner in front of you? I don't know what you exactly mean by that. It always struck me weird like when some people came into the office, she was she hugged them. I just felt it was kind of strange to do this in a business office. I'm not saying only men, sometimes women. But I I promise to stop that practice in my office. Okay. There's one guy I will never hug. That's for sure. So you felt that her approach was unusual? Yes. Other than you mean she would hug men and women alike? Sometimes it would be a woman, she'd come in and she'd hug her. Sometimes it was a man, you know, right out in the open. And I just thought this is well, I'm sure she knew the people and they

	Čase	se Compress Deposition of PATR	ICIA A	١. ٤	STAWICKI 3/14/02 Sheet 35
Γ		A I don't believe so.	1	1	A I don't honestly know. I can't tell you.
	2	Q So what about Linda Huerta? What did she tell you	2	1	Q What about Daisy Cubias? What prompted the
	3	about Marilyn Figueroa's conduct?	3		discussion on Marilyn Figueroa?
	J	A About the same as Daisy.	4		A I honestly can't tell you.
		Q When was the first time that Ms. Huerta opened up t	i		Q Anyone else that you may have heard discussing
		you with that kind of information?	6		Marilyn's behavior?
	6		7		A No.
		A A couple of years ago. O How did that happen?	8		O All right. And is it your sworn testimony that
		Q How did that happen?A I think in gossip in the office.	9		before Marilyn Figueroa left you did not know
١		Q Who was present when that occurred?	10		anything about her sexual interaction with
		A I'm not sure. Probably Patty Marshall and me. I'm	1		Mayor Norquist?
	11		12		A I did not know anything until we were called into
	12	not positive.		3'	the Mayor's office and Mike Soika told us. Prior to
	13	Q Is this a close group, Patty Marshall?	1		that everything we heard was rumor.
	14	A It's the clerical section. Q Did anyone else say anything when Linda Huerta	1 1		Q What did Mike say?
	15	disclosed that opinion about Marilyn Figueroa?	10		A At that time I believe he handed us a statement. I
	16		1		don't remember what was on the statement. And then
	17	A No, I don't think so. Q Did Linda Huerta mention names of men that she kr	i		he said the Mayor had had a consensual relationship
	18		1		with Marilyn.
	19	A 1'm not sure. Q When you say you're not sure	2		Q Did he disclose that Marilyn was going to be filing
	20	A I couldn't name anybody.	2		a claim at that time?
	22			2	A No. I don't believe so.
	23		- 1	3	Q Were you ever at any meetings where Mr. Soika
	24		- 1	24	disclosed that Marilyn was going to be filing a
	25			25	discrimination complaint?
	20	137			139
	1	before was that before Marilyn left?		1	A No.
4	2	A Oh, yes.		2	Q Did anyone ever tell you that Mr. Soika had notified
	3	Q Long before Marilyn left?		3	the staff that Marilyn was going to be filing a
	4	A Yes.		4	claim against the City?
	5	Q What prompted the discussion about Marilyn when	l l	5	A I probably learned through gossip again in the
	6	Linda Huerta made the statements that she slept		6	office. And I don't know who told me.
	7	around?		1	Q About what time did you learn that?
	8	A I don't know.	1	8	A I don't know.
	9		9	9	Q Was it the first week after she left, first day,
	10			10	second day?
	11	• •		11 12	A I don't know.
	12		- 1	12 13	Q What did you learn?A I believe Marilyn was going to file some kind of
	13			13 14	claim against the City or the Mayor. I don't know
	14			14 15	which one. I really don't.
	15			15 16	O You learned that before she was terminated I
	16			17	suspect?
	17	· ·		18	A I believe so, but I'm not positive.
	18		1	19	Q Did you ever discuss with Mr. Soika or anyone from
	19			20	
	20 21	· · · · · · · · · · · · · · · · · · ·		21	from Linda Huerta
	22			22	A No.
•	23			23	
J	24			24	• 0 0 , 0
	25			25	
	120	138			140

	e Compress Deposition of PATRICI	A A.	. STAWICKI 3/14/02 Sheet 37
	that by the time Marilyn was issued this letter of	1	Q Let's see if I can help you.
1	that by the time iviality it was issued this letter of	2	À Okay.
2	January 14th, 2000 she had in fact 30.5 hours of	3	Q You've got this 34.9.
3	accrued sick leave remaining. And I'll come right	4	A Okay. That's with the holiday included in there.
4	next to you.	5	Q That's what I
5	A January 14th, so	6	A So actually 26.9 is here. Okay. 34.9 is right
6	Q Take your time because I want to make sure	7	here. But we're starting on the 12th. This letter
7	A It looks like 32 hours to me. I can't be sure.	1	was dated the 14th.
8	Q What are you looking at in order to	8	Q All right. So according to your numbers, how much
9	A Well, I'm looking at January 14th, the date of the	9	time she still had?
10	letter.	10	A 26.9. 26.9. However, she was still accruing
11	Q Okay.	11	vacation while she was on vacation. 26.9 and 3.7 is
12	A And here starting the 18th I have her down for 32	12	
13	oh, wait. 24, 25, 26 and .9, did it start the 14th?	13	30. I think she was accruing vacation. I'm not
14	Each one of these would be eight hours, except the	14	sure.
15	last one would be 2.9 hours.	15	Q So what would be the correct number?
16	Q So eight hours would be?	16	A I don't know.
17	A So this would be 32, 34.9, or if it was after the	17	Q You have 34.9 in here.
18	14th, if he were counting this date it would be	18	
19	26.9.	19	Q You have 32 over here.
20	Q So she had a total of 32	20	
21	A She either had 32 or 26, and I don't know exactly	21	Q Right.
22	where this came from. However, I'm sure I gave him	22	
23	this figure. He wouldn't have just grasped it from	23	Q And what about over here?
24	the air.	24	
25	Q But now that you're double checking you come to the	25	and the 26.9 is 43.3. 147
	145		
1	conclusion that that number on page, on Exhibit 11	1	Q So are you able to tell me what is the accurate
2	is not accurate?	2	
3	A I'm not sure.	3	· · · · · · · · · · · · · · · · · · ·
4	Q Well, I want to give you that opportunity.	4	Q 43.3?
5	According to these records, is that 30.5 hours an	5	A After she has used this, yes. She had used all this
6	accurate number?	6	
7	A I don't know.	7	
8	Q What would be required for you to know?	8	•
9	A I would probably have to sit down with all these	9	
10	pages and really go through everything.	10	
11	Q That's what I need.	11	
12	A With pencil and paper.	12	
13	Q That's what I want you to do.	13	
14	A Right now?	14	
15	Q Yes. And I want you to break it down by sick leave	15	0 0
16	entitlements and vacation and holidays.	16	
17	A Okay. Okay.	17	
18	Q Let's see if I can help you to save some time.	18	
19	A All right. This vacation, she has used her vacation	19	
20	as of the 12th. This date is January 14th. So she	20	hours are exhausted you will no longer receive
21	did not have any vacation left which she has said.	21	•
22	You have now exhausted your accrued vacation.	22	•
23	43.3 minus .4 minus 1 43.3 minus 8.5 is	23	
24	what? 35 wait. This is .4. Do we have a	24	
25	noncil?	25	5 A I wasn't aware she was on FMLA leave. I thought she

A I wasn't aware she was on FMLA leave. I thought she

148

146

25

pencil?

	Cas	se Compress Deposition of PATRICIA			
ſ	1	Q Did you ever talk to Mr. Hansen at all before that	1		I don't know.
	2	letter was sent?	2	-Q	Who directed you to clean her desk?
١	3	A Before this letter was sent?	3	À	I can't remember.
-			Δ		What did you do as far as cleaning her desk was
H	4	Q Right.	5	-	concerned?
	5	A I talked to him regarding the FMLA leave.	_		
	6	Q On the day that	6	Α	Things that we thought were personal we put in a
٠	7	A Well, I don't know what day it was.	1		box, and they're upstairs in an upper level of the
١	8	Q Well, do you know when you spoke to him about the	8		Mayor's office. They're still up there. I think
	9	family leave act?	9		there's one or two boxes which we thought were
	10	A I can't tell you an exact date.	10		personal. City things we just kind of cleared up
-		Q In relation to the termination letter, do you know	11		like books and things, filed some things away.
	11		12		What did you find as far as City things?
	12	when that happened?	13		Probably things Marilyn was working on before she
	13	A I would think before, but I'm not positive.	1	^	
-	14	Q All right. Let me have all those exhibits. Did	14	_	left.
- 1	15	Mr. Soika ever tell you, mention whether or not the	15	-	Like what?
-	16	Mayor was approving the termination of	16	Α	I don't recall.
ĺ	17	Marilyn Figueroa?	17	Q	Projects?
	18	A He never mentioned that.	18	Α	I don't recall.
	19	(Exhibit No. 13 marked for	19	Q	You don't recall anything that you cleaned out of
	20	identification)	20	`	Marilyn's desk?
ļ		Q Let me show you Exhibit No. 13, ma'am. Have you	21	Α	No.
	21		22		Books and projects. What other things did you clean
	22	ever seen that record before?	23	V	or remove?
	23	A Yes.		٨	
	24	Q This is a memo from Linda Huerta to you; is that	24		Her personal things.
	25	correct?	25	Q	You told me that. Anything else?
		. 153			155
	1	A Correct	1	Α	No.
	1	A Correct.	1 2		
	2	Q Does she report to you?	2	Q	Who cleared her computer?
	2	Q Does she report to you? A Does Linda report to me?	2	Q A	Who cleared her computer? I don't know.
	2 3 4	Q Does she report to you?A Does Linda report to me?Q Right.	2 3 4	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find?
	2 3 4 5	Q Does she report to you?A Does Linda report to me?Q Right.A I don't understand.	2 3 4 5	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I
	2 3 4 5 6	Q Does she report to you?A Does Linda report to me?Q Right.A I don't understand.Q Do you supervise her?	2 3 4	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs.
	2 3 4 5 6 7	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. 	2 3 4 5 6 7	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was
	2 3 4 5 6 7 8	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that 	2 3 4 5 6 7 8	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it
	2 3 4 5 6 7	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. 	2 3 4 5 6 7 8 9	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of
	2 3 4 5 6 7 8	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? 	2 3 4 5 6 7 8 9	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature.
	2 3 4 5 6 7 8 9	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. 	2 3 4 5 6 7 8 9 10	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those
	2 3 4 5 6 7 8 9 10	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical 	2 3 4 5 6 7 8 9	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do
	2 3 4 5 6 7 8 9 10 11	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? 	2 3 4 5 6 7 8 9 10	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those
	2 3 4 5 6 7 8 9 10 11 12 13	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. 	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do
	2 3 4 5 6 7 8 9 10 11 12 13	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. 	2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you wanted them personally.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. Q Was it before she was terminated or after? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. Q Was it before she was terminated or after? A I don't know. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you wanted them personally.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. Q Was it before she was terminated or after? A I don't know. Q Was it the same week she left or 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you wanted them personally. MR. ARELLANO: Well, you may. I just want to know if they will be turned over
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. Q Was it before she was terminated or after? A I don't know. Q Was it the same week she left or A I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you wanted them personally. MR. ARELLANO: Well, you may. I just want to know if they will be turned over to us, and if not, why not.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. Q Was it before she was terminated or after? A I don't know. Q Was it the same week she left or A I don't know. Q Was it before she was hospitalized or after she was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you wanted them personally. MR. ARELLANO: Well, you may. I just want to know if they will be turned over to us, and if not, why not. MR. TOKUS: I will look into it,
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q Does she report to you? A Does Linda report to me? Q Right. A I don't understand. Q Do you supervise her? A Yes. Q Who instructed Linda to notify the public that Marilyn Figueroa was on medical leave? A I don't know. Q Did you ever tell her that Marilyn was on medical leave? A No. Q Let me have that again. Were you strike that. Do you know who cleaned Marilyn Figueroa's desk after she left? A I think Patty Marshall and I cleaned her office. Q When did you do that? A I don't know when. Q Was it before she was terminated or after? A I don't know. Q Was it the same week she left or A I don't know. Q Was it before she was hospitalized or after she was	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A	Who cleared her computer? I don't know. As far as her personal things, what did you find? There was a painting that she had on the wall, and I think it was hers, so that was taken upstairs. There might have been a couple paintings. There was a pair of shoes, I think one boot, coffee mug, it might have been a picture of her children, things of that nature. MR. ARELLANO: Can we get those things tomorrow, counsel? Whomever? Or do you want us to go get them, or what do you want us to do? MR. TOKUS: Are those things under subpoena? MR. ARELLANO: Do you want to keep them? MR. TOKUS: I thought maybe you wanted them personally. MR. ARELLANO: Well, you may. I just want to know if they will be turned over to us, and if not, why not.

Cas	se Compress Deposition of FATRICIA		
1	Q Where are they kept or who keeps them?	1	if I can reconstruct this correctly, she said she
2	A I keep the time cards and they're kept in a file at	2	was hurt and that she was under doctor's care, but I
3	my desk.	3	don't think she brought in any certificate either.
4	Q How are the time cards completed?	4	She just didn't call in. And at the time I believe
5	A Okay. Each, beginning of each pay period each	5	she did talk to Mr. Christofferson.
6	person is given a time card, and they are to fill it	6	Q And what happened?
	out on a daily basis and return it to me on the	7	A I don't know. In the end she lost her job.
7	The start before the end of the new period	8	Q Was she fired by Mr. Christofferson?
8	Thursday before the end of the pay period.	9	A I don't know. I don't know if she was terminated
9	Q And what do you do with them?	10	or
10	A I compare them with the sign-in and out sheets that	11	Q Were you involved in the processing of her
11	l get from the receptionist and make sure that	12	A I was in it, yes.
12	whatever time is on their time card is the same as	ľ	Q As far as did she take sick leave for awhile?
13	what they have on the receptionist sign in and out	13	A I believe she did. I'd have to look at her records
14	sheet. For instance, if somebody called in sick,	14	
15	the receptionist would indicate on her sheet. If	15	also. I don't know if I have them right here. I
16	they sent me a time card that said they worked that	16	don't know what year that was. Oh, it was 1996.
17	day, I look at the sheet and see there's a	17	She took 56 hours of sick leave during pay period
18	discrepancy, and then I would go in to that person	18	22.
19	and say you forgot that you were sick that day and	19	Q And then what happened?
20	they'd say, oh, yes, I forgot.	20	A Evidently she was out of sick leave. And at that
21	Q So you verify those cards?	21	point I don't know what happened.
22	A Yes, I do. And if there's anything that looks	22	Q Did you contact Ms. Anderson at all?
23	strange to me, I would go into a higher-up and see	23	A When?
24	what they wanted done.	24	Q While she was taking sick leave.
25	Q Does the Mayor keep time cards?	25	A I think I did, and there might be a memo in her file
	161		163
1	A The Mayor does not fill out a time card, no.	1	to that effect.
	Q What about the chief of staff?	2	Q What was the purpose of your contact?
2 3	A The chief of staff does.	3	A I was trying to find out, I believe trying to find
1.	Q Do you recall after January 4th seeing	4	out when she thought her doctor would release her to
5	Mr. Christofferson holding meetings at the Mayor's	5	come back to work because we really needed to know.
1 -	office?	6	Q Was this person needed very much at the office?
6		7	A She's a receptionist, yes.
7	A No. Q When you worked with Mr. Christofferson, do you	8	Q Oh, so she was important?
8	recall ever learning that he may have fired some	9	A Yes.
9		10	Q And when you talked to her, what did she tell you?
10	people within the office?	11	A I can't remember. I'm sorry.
111	A Mr. Christofferson?	12	Q But you wrote a memo on that?
12	Q Correct.	13	A I believe I did.
13	A I don't think so.	14	Q Do you recall whether or not she ever submitted a
14	Q Do you know a person by the last name of Anderson	15	medical authorization to you?
15	that was	16	A I don't recall.
16	A Yes.	17	O You don't recall if she did or she didn't?
17	Q terminated?		A I don't recall if she did.
18	A Yes.	18	
19	Q Who is she?	19	Q Did you ever contact employment relations to address
20	A Oh, that's Rita Anderson. I forgot about her. She	20	her absence?
21	was a receptionist in the Mayor's office.	21	A I don't know.
22	Q And what happened to her?	22	Q That was what year?
23		23	A According to this, 1996.
24		24	Q 1996.
25		25	A She worked just briefly for the Mayor's office back
	162		164
		255-7	7700 Page 161 to Page 164

```
STATE OF WISCONSIN )
                         ) 55.
     COUNTY OF DANE
2
       I, TAUNIA NORTHOUSE, a Registered Diplomate Reporter
3
     and Notary Public in and for the State of Wisconsin, do
     hereby certify that the foregoing deposition was taken
     before me at the offices of Murphy, Gillick, Wicht &
6
     Prachthauser, Attorneys at Law, 330 East Kilbourn
     Avenue, (ity of Milwaukee, County of Milwaukee, and
8
      State of Wisconsin, on the 14th day of March 2002, that
      it was taken at the request of the Petitioner, upon
10
      verbal interrogatories; that it was taken in shorthand
11
      by me, a competent court reporter and disinterested
12
      person, approved by all parties in interest and
13
      thereafter converted to typewriting using computer-aided
14
      transcription; that said deposition is a true record of
15
      the deponent's testimony; that the appearances were as
16
      shown on Page 3 of the deposition; that the deposition
17
      was taken pursuant to notice and subpoena duces tecum;
18
      that said PATRICIA K. STAWICKI before examination was
19
      sworn by me to testify the truth, the whole truth, and
20
      nothing but the truth relative to said cause.
21
                 Dated March 24, 2002.
22
23
                              Registered Diplomate Reporter
Notary Public, State of Wisconsin
24
25
                                    169
```

1	still want you to give me an answer regardless of	1		any problems; all right? Finally, if for some
2	his objections. Is that okay?	2		reason you need to take a break, not for the
3	A I'm supposed to give you an answer even though he	3		purposes of discussing with counsel how you should
4	tells me not to answer?	4		answer but because you need a break, let me know.
5	Q No.	5	Α	All right.
6	A ls that what you said?	6		I just want to make sure you feel comfortable. Is
7	Q That's close.	7	`	that all right?
8	MR. TOKUS: Now remember what I	8	Α	Fine.
9	told you? Listen. That's not what he said.	9	0	Have you ever given testimony before under oath?
10	THE WITNESS: Okay.	10		No, I haven't.
11	MR. TOKUS: Listen carefully to	11		Is this your first time?
12	what he said.	12		Yes.
13	THE WITNESS: Okay.	13	Q	I suspect you are a little nervous.
14	Q But you are partly correct. If he tells you not to	14		A little.
15	answer	15	Q	There's no need to be nervous. It's just basically
16	A Don't answer.	16		a question and answer; okay? The only time when
17	Q don't answer. The judge will later on decide	17		people get into trouble is when they either don't
18	whether or not you should be forced to come back to	18		tell the whole truth or just simply lie because this
19	answer the question.	19		is sworn testimony subject to perjury. You look
20	A Okay.	20		such a lovely lady I don't think you would lie. All
21	Q All right? However, there will be times when he	21		right?
22	will object without telling you not to answer; all	22		All right.
23	right? Once he registers his objection, I still	23		What is your education, ma'am?
24	want you to answer. Do you understand me now?	24		I'm a high school graduate.
25	A Yes.	25	Q	Where did you go to high school?
	5	1		1
1	Q All right. If for some reason you don't understand	1		Pulaski High School.
2	my question, please let me know.	2	Q	Pulaski?
1	my question, please let me know. A 1 will.	2	Q A	Pulaski? Right.
2 3 4	my question, please let me know. A l will. Q l want to make sure that you understand every	2 3 4	Q A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears.
2 3 4 5	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating	2 3 4 5	Q A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much
2 3 4	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read	2 3 4 5 6	Q A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know.
2 3 4 5 6 7	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't	2 3 4 5 6 7	Q A Q A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe.
2 3 4 5 6 7 8	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just	2 3 4 5 6 7 8	Q A Q A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other
2 3 4 5 6 7 8 9	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you	2 3 4 5 6 7 8	Q A Q A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution?
2 3 4 5 6 7 8 9	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine?	2 3 4 5 6 7 8 9	Q A Q A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have.
2 3 4 5 6 7 8 9 10	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine.	2 3 4 5 6 7 8 9 10	Q A Q A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended?
2 3 4 5 6 7 8 9 10 11 12	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will	2 3 4 5 6 7 8 9 10 11	Q A Q A Q A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there.
2 3 4 5 6 7 8 9 10 11 12 13	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A Q A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College?
2 3 4 5 6 7 8 9 10 11 12 13 14	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head	2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A Q A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered
2 3 4 5 6 7 8 9 10 11 12 13 14 15	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A Q A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	QAQ AQAQA Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	QAQ AQAQA QA	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	QAQ AQAQA QAQ	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	QAQ AQAQA QAQA	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before you start speaking; okay?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	QAQ AQAQA QAQA	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes. All right. Did you achieve any type of certificate
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before you start speaking; okay? THE WITNESS: Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	QAQ AQAQA QAQAQ	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes. All right. Did you achieve any type of certificate or degree?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before you start speaking; okay? THE WITNESS: Okay. MR. TOKUS: Watch his lips. When	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	QAQ AQAQA QAQAQ	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes. All right. Did you achieve any type of certificate
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before you start speaking; okay? THE WITNESS: Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	QAQ AQAQA QAQAQ A	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes. All right. Did you achieve any type of certificate or degree? I did get a certificate that I had completed some
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before you start speaking; okay? THE WITNESS: Okay. MR. TOKUS: Watch his lips. When his lips quit moving, then you can talk; okay?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQ AQAQAQAQ A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes. All right. Did you achieve any type of certificate or degree? I did get a certificate that I had completed some courses.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	my question, please let me know. A I will. Q I want to make sure that you understand every question, and I don't have any problems in repeating my question or having the professional reporter read the question back for your convenience. I don't have any problems in modifying the question. I just want to make sure that before we try this case you and I understand each other. Is that fine? A Fine. Q And finally, and you're doing very well, she will want the two of us to answer every question verbally as opposed to nodding of the head A Okay, yes. Q or making certain noises. A Yes. Q I will understand when you make noises. MR. TOKUS: Let him finish before you start speaking; okay? THE WITNESS: Okay. MR. TOKUS: Watch his lips. When his lips quit moving, then you can talk; okay? THE WITNESS: Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	QAQ AQAQAQAQ A Q	Pulaski? Right. Oh, wonderful. She's my neighbor. Bonduel Bears. I just want to make sure that you realize how much we have in common. '71 in case you wanted to know. I forgot when I graduated. '56 I believe. Other than high school, have you attended any other academic institution? Yes, I have. Which other institutions have you attended? Well, technical college, I took classes there. The Milwaukee Technical College? Correct. They came to City Hall and offered classes, and I took some of those classes. Was this a benefit that the City offered to you? Yes. The City paid for that as well? Yes. All right. Did you achieve any type of certificate or degree? I did get a certificate that I had completed some courses. And how many credits did you achieve?

	03C 1	compless Deposition of LATRICE	<u> </u>		AVVICKI 3/14/02 Sheet	~
1	Α	That's correct.	1	Α	Yes.	\neg
2	C	Is that right?	2	0	Now, we'll go into some of these questions in a	
3		Yes.	3	•	minute; okay? I just want to give you just a little	
4		So you have had your share of mayors?	4		more information about this deposition. Did you	
5		Right.	5			
			i		review any other document, videos, information wit	n [
6	Ç	ls that correct? How many mayors have you worked	6		regards to this deposition?	- 1
7		for, directly and/or indirectly?	7		A couple days ago I met with Mr. Tokus and	
8		Frank Ziegler, Henry Maier, John Norquist.	8	-	Who else was present?	
9		Pefore coming here today, did you do anything to	9	Α	Barbara Teipner I don't know her correct last	1
10		prepare for this deposition?	10		name.	
11	Α	I looked at this.	11	Q	Anyone else?	
12	Q	Let me see what is that.	12	Α	No. The three of us.	- 1
13		(Exhibit No. 1 marked for	13	Q	The three of us meaning Mr. Tokus, yourself and	
14		identification)	14	•	Barb	
15		Your last response stated that you looked at the	15	Α	Correct.	- 1
16		complainant's supplemental request for production of	16		Teipner did you say? You never met Ms. Teipner	
17		documents, subpoena duces tecum; is that correct?	17	•	before?	
18		If that's what that is, that's what I looked at.	18	Δ	No.	
19		And you highlighted Pat Stawicki?	19		Did you know where she works?	
20		I did not highlight that.	20		She works in the City Attorney's Office.	
21			21			
		Somebody did that for you?	22		She's the paralegal?	ŀ
22		Right.	i e		Correct.	
23	Ų	And your sworn testimony is that you reviewed this	23		Did you review any records during that meeting?	
24	٨	document?	24		I did with Barbara.	ŀ
25	А	Yes.	25	Q	What records did you review?	
		13			15	_
1	Q	Did you review the entire document?	1	Α	Time cards.	4
2	Α	l looked at the entire document.	2	Q	Anything else?	
3	Q	Did you understand the contents of the document?	3	Α	I reviewed payment certifications.	
4	Α	Most of it I did.	4	Q	Payment certifications?	l
. 5	Q	Did you find some of these items applicable to	5	Α	Yes.	
6		you	6	Q	Anything else?	
7	Α	Yes.	7	Α	Payroll sheets.	
8	Q	in your capacity	8	Q	Did you review anything else?	
9	Α	Yes.	9	_	l can't remember anything else.	
10	O	as a City employee?	10	0		2.
11		Correct.	11	`	the meeting that you are referencing?	<i>"</i>
12		It appears to me that you, at least somebody faxed	12	Α	At that meeting we did not go over the document.	ŀ
13	`	this document to you on January 28th of the year	13		Was that another meeting where you went to	
14		2002. Is that an accurate reading of what I have in	14		That was yesterday, Barbara and I went over the	
15		this document?	15	• •	document.	
16	А	I got that document yesterday.	16	0	So this is a separate meeting	
17		You got this document yesterday? Are you able to	17	-	Yes.	
18		tell me where this fax number belongs to?	18		between you and Barb; is that correct?	
19		I'm not able to, no. I don't know.	19		Correct.	
20		Okay, let me take a look at this document. Did you	20		And you're doing just wonderful, except that at som	20
21	V	·	21	V		
22	Λ	bring any other records with you?	22		point she's going to let us know when we talk at the	
		No.			same time because she cannot take dictation of two	4
23		You have an empty envelope before you?	23		people speaking at the same time. And so I usually	
24		Uh-huh.	24		make that mistake, I talk before you finish, but we	
25	Q	ls that correct?	25		both have got to give each other a little room so	
		1/	ı		16	
<u> </u>		14			10	

	ase	Compress Deposition of PATRIC	IA A.	3	IAWICKI 3/14/02 Sheet 6	
1		you work under him?	1	Α	I volunteered.	٦
2	Α	For all of his terms.	2	Q	Do you know anyone within his office that did not	
3	0	How many terms did he serve?	3	`	work in his, in any of his political campaigns, any	-
4	_	Did he have four or five terms?	4		one person that didn't do that?	À
5		Okay.	5	Α	I believe Patty Marshall did not work in any of his	Ţ
. 6		Six? It might have been more. It was a long time.	6	• •	campaigns.	-
7		How was your experience under Mayor Maier?	7	0	Who is Patty Marshall?	
8		I enjoyed working for all the mayors.	8		She's one of the clerical people.	
9		Do you recall any time when there was lots of	9		Is she working under your jurisdiction?	-
10	~	litigation against Mayor Maier while you were	10		Well, actually her title is higher than mine.	
11		employed for his office?	11		Do you have any opinion as to why she is the only	ı
12	Δ	l don't recall any.	12	V	one that has not participated in any of the	
13		Is this the first time that you have faced	13		political campaigns for Mayor Norquist?	
14	Ų	litigation while working for a Mayor?	14	Δ	She has a family. She has four children and she	-
15	Δ	Yes.	15		doesn't have time.	
16			16	Ω	Can't spare time.	۱
	Ų	Did you in any way participate in some of the	1	-		
17 18	٨	political campaigns for former Mayor Ziegler? No.	17 18		Uh-uh. Did you work in any other political campaigns other	
			19	Ų	,	
19		What about former Mayor Maier?	20		than the one that you just mentioned here for last	1
20		I'm not sure.		۸	year, last	-
21	Ų	Did Mayor, former Mayor Ziegler ever ask you to	21		For Mayor Norquist?	1
22	۸	participate in political campaigns?	22 23		Right.	
23		No.			No.	-
24	Ų	What about former Mayor Maier? Was it Maier or	24	Ų	Other than you strike that. Who was coordinating	1
25		Maiers?	25		the political work that you were doing for	
		21			23	
1		Maier. He did not personally.	1		Mayor Norquist?	Ų
2	Q	And you're not sure whether or not you ever	2		I think it was Molly Christofferson.	
3		participated in some political campaigning for	3	Q	And to your knowledge, who was the chief coordinator	î
4		former Mayor Maier?	4		of the political campaign when you participated in	
5		I'm not positive.	5		his political re-election?	
6	Q	Have you participated in any political campaign work	6		I don't know.	1
7		for Mayor Norquist since he has been in his	7	-	Was it Bill Christofferson?	
8		position?	8		It might have been, but I am not sure.	
9	Α	No.	9	Q	Do you know Bill Christofferson personally?	
10	· Q	Ever done any, any type of political work on his	10	Α	Yes, I do.	
11		behalf?	11	Q	How long have you known Mr. Christofferson?	
12	Α	I worked at a phone bank.	12		I've known him a few years.	
13	Q	When was that?	13		How did you meet Mr. Christofferson?	
14	. A	It was during his last campaign I believe, two years	14	Α	Mr. Christofferson was chief of staff at one time	-
15		ago.	15		for the Mayor.	1
16	Q	And what was the nature of your duties?	16	Q	Did you know him before that?	ļ
17	Α	To call registered voters and tell them that the	17	Α	I did not.	
18		election was a certain date and that they should get	18	Q	So you met him through the Mayor's office?	
19		out there and vote.	19		Yes.	
20	Q	You were just putting the pressure out there?	20	Q	Is that correct? Did you ever report to	
		Right.	21	•	Mr. Christofferson?	
21	, ,	ě .	22	Α	I might have on occasion.	
1		To make sure they vote?				
21	Q	To make sure they vote? Right.	23	Q	What's your understanding of Mr. Christofferson's	
21 22 23	Q A	Right.		Q	What's your understanding of Mr. Christofferson's professional business?	
21 22	Q A	Right. How did you happen to work in this last campaign as	23		What's your understanding of Mr. Christofferson's professional business? I think he's a consultant.	
21 22 23 24	Q A	Right.	23 24		professional business?	

-			beposition of Antion			TATTOR SHEEL O
-	1	Α	No, no.	1	Α	Yes.
	2		Thank you. I didn't think so. Inversely, have you	2		And I suspect the procedure that just, that you just
	3	~	received any promotions since you have been employed	3	V	· · · · · · · · · · · · · · · · · · ·
				1		outlined for the record pertains to the practices
	4		under the administration of John Norquist?	4		within the Mayor's office?
1	5	Α	No.	5	Α	Yes.
-	6	Q	How do tell me how do you get any type of	6	Q	And I suspect this is the practice that has been in
1	7		promotion or increase in pay or award for your	7	•	place for as long as you've been employed for the
İ	8		services?	8		Mayor's office?
1	9	Δ	In previous years I just asked for one. I asked	9	٨	• •
-		$^{\wedge}$	• •	1		Right.
	10		them to reclassify my position. City Service	10	Ų	Is that correct? You stated that you consult with
	11		Commission came down and looked at my duties, and	11		employment relations; true?
	12		they said whether or not they felt that it would be	12	Α	Yes.
١	13		a reclassified position.	13	Q	And then you fill out the forms; correct?
ı	14	Q	What about pay increase? How does that occur, if it	14	_	Yes.
	15	`	does?	15	0	And then a doctor's excuse is required?
	16	Α	You start at one level of a pay grade and every year	16		Yes.
	17	, , .		17		
- 1		\circ	you automatically get an increment.	1		Is that correct? Which forms are you referring to?
	18	-	So that is a policy already in place?	18	А	I don't know the name of the forms offhand. If I
- 1	19		Yes.	19		saw them, l
	20	-	Is that correct?	20	Q	What's the content of the form? What's the
	21	Α	Yes.	21		objective?
-	22	Q	Do you recall any one time when you received any	22	Α	It's for family leave, the one that I'm referring
1	23		special awards or recognition from any of your	23		to. And it asks why the person is requesting it
	24		superiors?	24		and the approximate dates that they're requesting
	25	Α	None.	25		the leave and whether it will be taken off I believe
			29			31
- 1						V1
····}				ł		
	1	Q	Have you ever taken any type of long-term medical	1		vacation time or sick leave or
	2	Q	Have you ever taken any type of long-term medical leave during your employment with the City?	1 2	Q	vacation time or sick leave or So let me see if I understand what you're telling
				ľ	Q	So let me see if I understand what you're telling
	2	Α	leave during your employment with the City?	2	Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee
	2 3 4	Α	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that	2 3 4	Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your
	2 3 4 5	Α	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've	2 3 4 5		So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct?
	2 3 4 5 6	A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there?	2 3 4 5 6	Α	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct.
	2 3 4 5 6 7	A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave.	2 3 4 5 6 7	Α	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with
	2 3 4 5 6 7 8	A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals?	2 3 4 5 6 7 8	A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct?
	2 3 4 5 6 7 8 9	A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think	2 3 4 5 6 7 8	A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right.
- 1	2 3 4 5 6 7 8 9	A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood.	2 3 4 5 6 7 8 9	A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms?
	2 3 4 5 6 7 8 9 10 11	A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach	2 3 4 5 6 7 8 9 10	A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes.
	2 3 4 5 6 7 8 9 10 11	A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave.	2 3 4 5 6 7 8 9 10 11	A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee?
	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes.
	2 3 4 5 6 7 8 9 10 11	A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave.	2 3 4 5 6 7 8 9 10 11	A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee?
	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh.	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a
	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed?	2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach,
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented at the time that the request is made.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm not positive. It might have been done.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented at the time that the request is made. And anything else?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm not positive. It might have been done. Are the procedures for mayoral assistants different
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented at the time that the request is made. And anything else? That's all I can remember.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm not positive. It might have been done.
The second secon	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented at the time that the request is made. And anything else?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm not positive. It might have been done. Are the procedures for mayoral assistants different
The second secon	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented at the time that the request is made. And anything else? That's all I can remember.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm not positive. It might have been done. Are the procedures for mayoral assistants different than the procedures for administrative staff as far
The second secon	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	leave during your employment with the City? Never. Do you know anyone within the Mayor's office that took more than 10 days medical leave since you've been employed there? We had a couple people that were on maternity leave. Who were these individuals? Ruth Wyttenbach, Patty Marshall and I think Brenda Wood. And I think you're very accurate. Ms. Wyttenbach did mention that she took some medical leave. Uh-huh. When there is a medical leave request, how is this request processed? Generally what I do is to call Department of Employee Relations and ask them what paperwork is necessary. I then fill out the forms. And then? And I believe a doctor's excuse has to be presented at the time that the request is made. And anything else? That's all I can remember. I suspect this is a task that falls within your	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q	So let me see if I understand what you're telling us, okay? If you become aware that an employee requests family leave, then that triggers your action; correct? Correct. You then follow the following steps: You check with employment relations; correct? Right. And then you get the required forms? Yes. True? You give those forms to the employee? Yes. And then you demand that the employee provide a medical absence; is that right? That's right. Is that what you did with Ms. Wyttenbach, Ms. Marshall and Ms. Wood? I remember doing it for Ms. Marshall and Ms. Wyttenbach. I don't recall for Ms. Wood. I'm not positive. It might have been done. Are the procedures for mayoral assistants different than the procedures for administrative staff as far as medical leave is concerned?

	ase Compless Deposition of PATRIC	., , , ,,	STATION SHEET TO
1	that employee?	1	A I did have contact with the Department of Employee
2	A If they asked, I would find out for them.	2	Relations. I had put through in our computer
3	Q What happens if an employee doesn't return that	3	system, our payroll system a request, and I was told
4	form? Do you follow up as a matter of practice?	4	that someone called me from employee relations.
5	A I do not, no.	5	I was told that this request was no good unless I
6	Q Do you know if anyone follows up?	6	had a doctor's excuse from Marilyn's doctor.
7	A I don't know.	7	Q So in answer to my question well, let me
8	Q If that form is not completed, can the family leave	8	follow
9	be granted without the form?	9	MR. TOKUS: Listen carefully to
10	A No.	10	what he says.
111	Q And those forms, do you have those forms in your	11	Q You're doing very fine, ma'am. No need for that.
12	office, or do you usually require them from	12	So as far as you know, did you ever send
13	A I might have one or two in my office. I'm not	13	Marilyn Figueroa any of the required forms in order
14	positive.	14	for her to apply and qualify for family medical
15	Q And if you don't have them, obviously	15	leave?
16	A I would get them from employee relations.	16	A I don't remember.
17	Q And do you recall any one time when anyone explained	17	Q Obviously when you made the request for those forms,
18	to you or informed you that those forms are not	18	were you intending to send it to Marilyn so that she
19	required?	19	could complete those forms?
20	A No.	20	MR. TOKUS: Objection. That's not
21	Q So inversely, it is your understanding that they are	21	the state of the record.
22	always required?	22	Q He does that to just
23	A Correct.	23	MR. TOKUS: You may answer if you
24	Q When Marilyn Figueroa left in January of the year	24	know.
25	2000, do you recall ever sending any forms to	25	MR. ARELLANO: Subject to his
1	37		39
1	5.	1	
1		1	
1 2	Marilyn Figueroa, the forms that you are citing here	1 2	objection can you read her that question.
2	Marilyn Figueroa, the forms that you are citing here today that are required?	1 2 3	objection can you read her that question. Don't let the lawyers get you nervous. It's
2 3	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive.	2	objection can you read her that question.
2 3 4	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you	2 3	objection can you read her that question. Don't let the lawyers get you nervous. It's not important.
2 3 4 5	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms?	2 3 4	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read)
2 3 4	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you	2 3 4 5	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might
2 3 4 5 6	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I	2 3 4 5 6	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika?
2 3 4 5 6 7 8	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that.	2 3 4 5 6 7	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her.
2 3 4 5 6 7	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for	2 3 4 5 6 7 8	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika?
2 3 4 5 6 7 8 9	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification)	2 3 4 5 6 7 8 9 10	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't.
2 3 4 5 6 7 8 9	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000,	2 3 4 5 6 7 8 9 10 11	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that?
2 3 4 5 6 7 8 9 10	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record?	2 3 4 5 6 7 8 9 10 11 12 13	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy?
2 3 4 5 6 7 8 9 10 11 12 13 14	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember.	2 3 4 5 6 7 8 9 10 11 12 13 14	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa	2 3 4 5 6 7 8 9 10 11 12 13 14 15	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave? A Can you say that again, please?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not the state of the record.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave? A Can you say that again, please? Q Sure. She will read it back for you.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not the state of the record. Q Now, subject to his objection, which I think is
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave? A Can you say that again, please? Q Sure. She will read it back for you. (Question read)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not the state of the record. Q Now, subject to his objection, which I think is being intrusive, I want you to listen to the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave? A Can you say that again, please? Q Sure. She will read it back for you. (Question read) MR. TOKUS: And do you understand.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not the state of the record. Q Now, subject to his objection, which I think is being intrusive, I want you to listen to the question, subject to his objection without any
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave? A Can you say that again, please? Q Sure. She will read it back for you. (Question read) MR. TOKUS: And do you understand the question?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not the state of the record. Q Now, subject to his objection, which I think is being intrusive, I want you to listen to the question, subject to his objection without any interference and answer the question. Okay?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Marilyn Figueroa, the forms that you are citing here today that are required? A I'm not positive. Q Have you looked at her personnel file to see if you sent those forms? A I glanced through her file. I don't know if I looked for that. (Exhibit No. 2 marked for identification) Q When Marilyn Figueroa left in January 4th of 2000, do you recall whether or not anyone asked you to send Marilyn Figueroa these forms that you are discussing here on the record? A I don't remember. Q Do you recall whether or not after Marilyn Figueroa left on January 4th of the year 2000, whether or not you contacted the Department of Employment Relations for the purposes of obtaining the forms that are required in order for her to obtain medical leave? A Can you say that again, please? Q Sure. She will read it back for you. (Question read) MR. TOKUS: And do you understand.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	objection can you read her that question. Don't let the lawyers get you nervous. It's not important. (Question read) A I don't know the answer to that question. I might have given them to Marilyn's superior to give to her or to send to her. Q Mr. Soika? A It would have been Mr. Soika. Q Do you recall approximately when you did that? A No, I don't. Q But I suspect your objective was to follow City policy? A Correct. Q And that included obtaining the forms and making sure that the employee, in this case Marilyn Figueroa, would complete them as required by City policy? MR. TOKUS: Objection. That's not the state of the record. Q Now, subject to his objection, which I think is being intrusive, I want you to listen to the question, subject to his objection without any

1		directly from her. What I do is to put it into the	1	Q	And what did you tell him?
2		computer and somehow it goes to Department of	2	Α	I told him that I couldn't that the City could
3		Employee Relations where they screen these things.	3		not process the forms until a doctor's excuse was
4		And if things aren't just correct, they let the	4		brought in or sent in or whatever.
5		department know.	5	Q	And what did Mr. Soika say in response?
6	0	Tell me the two or three that you sent to the	6		He said Marilyn said she would send in a doctor's
7	*	department, what procedure did you follow in the	7		excuse. I don't know when Marilyn, or he requested
8		past?	8		this of Marilyn, whether he talked to her,
9	Α	I called employee relations. I asked them what I	9		whether I think Marilyn called the office and
10	′`	was supposed to do. They told me. I filled out the	10		talked to the receptionist and said she would send
11		forms. And I believe these people gave me doctors'	11		in the doctor's excuse for family leave.
12		excuses. And at that time I sent them to employee	12	0	Do you know if she ever sent that medical excuse?
13		relations.	13	-	I don't know. I didn't see it.
14	0	When you don't get a doctor's excuse, do you notify	14		During all of the years that you have worked for the
15	Y	the employer the employee?	15	•	Mayor's office, have you ever received late medical
16	Δ	I don't personally.	16		excuses and still accept them?
17		Who does?	17	Α	No.
18		I would assume their direct supervisor does.	18		To your knowledge? Do you know if Mr do you
19		When you were requesting the family leave forms for	19	~	know if Mr. Soika ever received any type of notice
20	Ų	Marilyn Figueroa	20		that Marilyn had issued a medical excuse from her
21	Δ	Uh-huh.	21		doctor?
22		after January 4th, 2000, do you remember	22	Α	If she had issued a medical
23	V	approximately when you sent that request?	23		Right.
24	Α	No, no.	24		Or if her doctor had issued one to her?
25		But nevertheless you sent it via computer?	25		Right.
23	· V	45		•	47
-			1	Λ	I don't know
1		Correct.	1		I don't know.
2		Is that right? What prompted you to request those	2		Now, when the office of employment relations told
2	Q	ls that right? What prompted you to request those forms on behalf of Ms. Figueroa?	2		Now, when the office of employment relations told you that they could not process her medical leave
2 3 4	Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to.	2 3 4	Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that?
2 3 4 5	Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the	2 3 4 5	Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes.
2 3 4 5 6	Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request?	2 3 4 5 6	Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that?
2 3 4 5 6 7	Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No.	2 3 4 5 6 7	Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know.
2 3 4 5 6 7 8	Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he	2 3 4 5 6 7 8	Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before
2 3 4 5 6 7 8 9	Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them?	2 3 4 5 6 7 8 9	Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In
2 3 4 5 6 7 8 9	Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that	2 3 4 5 6 7 8 9	Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead.
2 3 4 5 6 7 8 9	Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from	2 3 4 5 6 7 8 9 10	Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know
2 3 4 5 6 7 8 9 10 11	Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn.	2 3 4 5 6 7 8 9 10 11	Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my
2 3 4 5 6 7 8 9 10 11 12	Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms.	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I
2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No.	2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today? It's probably in Marilyn's personnel file.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record. No. What did they tell you?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words — go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today? It's probably in Marilyn's personnel file. Well, let me show you what we have obtained from the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record. No. What did they tell you? They said I couldn't process this family leave for	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today? It's probably in Marilyn's personnel file. Well, let me show you what we have obtained from the City's attorneys which represents to be
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record. No. What did they tell you? They said I couldn't process this family leave for her until they had a doctor's excuse.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today? It's probably in Marilyn's personnel file. Well, let me show you what we have obtained from the City's attorneys which represents to be Marilyn Figueroa's personnel file. And tell me
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record. No. What did they tell you? They said I couldn't process this family leave for her until they had a doctor's excuse. Did you report that to Mr. Soika?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today? It's probably in Marilyn's personnel file. Well, let me show you what we have obtained from the City's attorneys which represents to be Marilyn Figueroa's personnel file. And tell me whether or not you find
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A Q A Q	Is that right? What prompted you to request those forms on behalf of Ms. Figueroa? Mr. Soika asked me to. Did you ever see any forms returned from the employment relations pursuant to your request? No. Did Mr. Soika ever mention to you whether or not he received them? No, that's all he I think he mentioned to me that he had not received the doctor's excuse from Marilyn. No, I'm talking about the forms. No. When employment relations told you as I understand, they told you they could not give you the forms? MR. TOKUS: Objection, that's not the state of the record. No. What did they tell you? They said I couldn't process this family leave for her until they had a doctor's excuse.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A Q A Q	Now, when the office of employment relations told you that they could not process her medical leave request, were you surprised by that? Yes. Why is that? I don't know. Did you have any forms available in your desk before you requested one from employment relations? In other words go ahead. I had the paper form in front of me. I don't know if it was in front of me. It was someplace on my desk. But I had put it through the computer. I believe I put that through the computer first. Had you completed it? Had you filled it out? The paper form? Right. I don't think so. Do you know where that form is today? It's probably in Marilyn's personnel file. Well, let me show you what we have obtained from the City's attorneys which represents to be Marilyn Figueroa's personnel file. And tell me

		Compless Deposition of 1 ATTGO			
1	Α	Date.	1		them. Where it is, I don't know at this point.
2		1/27/00?	2	Q	So your understanding pursuant to the instructions
3		I don't think I put this number in. I'm not sure.	3		that Mr. Soika gave you was that Marilyn would be on
4	Q	Do you know who may have plugged January 27, 2000?	4	_	leave as of January 22nd, 2000?
5	Α	No.	5	Α	He told me she would be on leave when all of her
6	Q	What is your understanding of that date as it	6		vacation and sick leave had run out. She would be
7	•	pertains to the family leave act?	7		on unpaid leave.
8	Α	l have no idea.	8	Q	And your understanding was that January 22nd, 2000
9	0	Is that the triggering date?	9		is when the family leave would trigger?
10		l don't know.	10	Α	Correct.
11		Then we move to the next item and it's civil	11	Q	Is that correct?
12	•	service. She was not a civil service employee;	12	Α	That's correct.
13		correct?	13	Q	Pursuant to his instructions?
14	Α	She was exempt.	14	À	Right.
15		And then department	15		And then you wrote strike that. Do you recognize
16		That's Mayor's office department number.	16	`	these notations?
17		And what is this?	17	Α	Yes, that's my writing. I make a notation after I
18	•	Mayor.	18		do these, and I put effective pay period 2, which
19		What is on top of Mayor?	19		would have been January 22nd, 2000, leave of absence
20		Encumbrance override. I don't know what that means.	20		FMLA unpaid.
21		And you have Mayor.	21	0	And again, who instructed you to
22		Mayor, it comes up when you put in the department	22		To put this?
23	$^{\wedge}$	number. 1110 is Mayor.	23		Yes.
24	0	The director or head of the department would be?	24		I do that automatically for my own benefit. Like
25		No. They just call the department Mayor.	25		when I look through something, I can see readily
25	٨	53	-0		55
-			 		
1		Okay, very good. But it identifies the section	1	_	what it is.
2		The office.	2	Q	And what exactly did you mean when you wrote these
3	Q	within the City; is that correct?	3		notes? Effective payroll?
4		Correct.	4	Α	Pay period, effective pay period 2, we're on this
5		Job code, what is the significance of that?	5		date, 1/22/00. Marilyn would be on an unpaid family
6	Α		16		
		That would have been Marilyn's job code, and it's a	-	^	leave of absence.
7		code number given to the position that you hold.	7		So if Marilyn
8	Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date?	7 8	Α	So if Marilyn That was my intent.
8 9	Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor.	7 8 9	Α	So if Marilyn That was my intent. So that means that when would she have received the
8 9 10	Q A Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location?	7 8 9 10	A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck?
8 9 10 11	Q A Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01	7 8 9 10 11	A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a
8 9 10 11 12	Q A Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't	7 8 9 10 11 12	A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar.
8 9 10 11 12 13	Q A Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office.	7 8 9 10 11 12 13	A Q A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And
8 9 10 11 12 13 14	Q A Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have?	7 8 9 10 11 12 13 14	A Q A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay
8 9 10 11 12 13	Q A Q A Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again.	7 8 9 10 11 12 13 14 15	A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one.
8 9 10 11 12 13 14	Q A Q A Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have?	7 8 9 10 11 12 13 14 15 16	A Q A Q A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been?
8 9 10 11 12 13 14 15	Q A Q A Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again.	7 8 9 10 11 12 13 14 15 16	A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date.
8 9 10 11 12 13 14 15 16	Q A Q A Q A Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not	7 8 9 10 11 12 13 14 15 16 17	A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City
8 9 10 11 12 13 14 15 16	Q A Q A Q A Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable?	7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on?
8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct.	7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods.
8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct. And then rate factor blank?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods. And when does pay period one starts?
8 9 10 11 12 13 14 15 16 17 18 19 20	QAQA QAQAQA	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct. And then rate factor blank? Yeah. Is that correct? Correct.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods.
8 9 10 11 12 13 14 15 16 17 18 19 20 21	QAQA QAQAQA	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct. And then rate factor blank? Yeah. Is that correct?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods. And when does pay period one starts? Sometimes it starts in December of the previous year.
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	QAQA QAQAQA	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct. And then rate factor blank? Yeah. Is that correct? Correct.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods. And when does pay period one starts? Sometimes it starts in December of the previous year. Now, let me ask you, if Marilyn was placed on family
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQA QAQ AQAQ AQAQ	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct. And then rate factor blank? Yeah. Is that correct? Correct. And this is the form you sent what did you do	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods. And when does pay period one starts? Sometimes it starts in December of the previous year. Now, let me ask you, if Marilyn was placed on family leave on January 22nd, 2000 and assuming taking
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	QAQA QAQ AQAQ AQAQ	code number given to the position that you hold. And then 05/11/1992, was that the starting date? I would say yes of staff assistant to Mayor. And then location? Again we have 111, which is the Mayor's office. 01 is just a division of the Mayor's office. We don't have any division. It's one office. And then we have? Mayor administration which is this number again. And then right here we have regular shift not applicable? Correct. And then rate factor blank? Yeah. Is that correct? Correct. And this is the form you sent what did you do with this form once you completed that form?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	So if Marilyn That was my intent. So that means that when would she have received the last paycheck? Oh, I don't know without figuring it out on a calendar. And Her last paycheck probably would have been for pay period one. Which would have been? I don't know. I don't know the date. I suspect when you use that terminology the City goes by pay period one, pay period two and so on? Correct. There's 26 pay periods. And when does pay period one starts? Sometimes it starts in December of the previous year. Now, let me ask you, if Marilyn was placed on family

	ase compless Deposition of France	,	
1	A Deanna.	1	A That's correct.
2	Q And that she notified the department that she was	2	Q You obtained forms and gave those forms to her?
3	ill and would provide a doctor's excuse the	3	True?
4	following week; is that correct?		A Yes.
5	A Yes.	5	Q And with Ms. Marshall you obtained those forms and
6	Q Obviously there was no question in your mind given	6	gave those forms to her?
7	that email that Marilyn had notified the Mayor's	7	A Yes.
8	office that she was ill; true? At least that's what	8	Q And obviously this is your responsibility; correct?
9	the email said.		A If they ask me for this form, I give it to them,
10	A I believe that she called in and notified the	10	Q Or if they ask for medical leave, you provide them?
11	Mayor's office she was ill.	1 '	A I initiate the forms.
12	Q Do you recall, Ms. Stawicki let me now take a		Q So either they ask for the form, or if they just
13	look at this record. Thank you. Do you recall,	13	simply ask for medical leave, you then process those
14	Ms. Stawicki, whether or not Marilyn ever sent a	14	forms?
15	medical excuse?	1	A Correct.
16	A I don't know.		Q And you process those forms by giving them those
17	Q Do you recall Mr. Soika ever mentioning to you	17	forms?
18	whether or not Marilyn had submitted a medical	1	A Yes.
19	excuse?	1	Q And then they'll return those forms which are
20	A No.	20	required under City policy; correct?
21	Q Do you recall whether or not Mr. Soika instructed		A Yes.
22	you at any point to follow up and remind Marilyn to		Q And then you process them; is that correct?
23	submit a medical excuse?	1	A I send them to DER.
24	A No.	24 25	Q All right, all right. With respect to Ms. Wood, do
25	Q Do you recall any one time and just so you	25	you recall when she went on medical leave? 63
	61	ļ	00
1	understand the record, do you recall any one time	1	A No. I don't even know if she was on medical leave.
2	when you have called employees and told them I have		Q Do you know how long she was on medical leave?
3	not yet received your paperwork, I need it?	3	A No.
4	A No.	4	MR. TOKUS: Objection. That's not
5	Q Would that be unusual?	5	the state of the record.
6	A For me to call them?	6	Q You mentioned three people: Ms. Wyttenbach, you
7	Q Right.	1 6	mentioned Ms. Marshall, and then you mentioned
8	A I would think so.	8	Ms. Stawicki? A Ms. Wood.
9	Q Why is that?	9	Q Excuse me, Ms. Wood. This is his intention, to get
10	A I would assume their supervisor would call them and	11	me all confused. It's an old trick.
11	tell them they should get that in.	12	All right. Do you know if anyone from the
12	Q Do employees strike that. Are employees given these forms that you have discussed here? I'm	13	Mayor's office contacted Marilyn directly when those
14	talking about the medical leave forms. Are they	14	forms were not processed?
15	given those forms regularly, or are these the forms	15	A I don't know.
16	that you have to give them when they request medical	16	Q If Marilyn would have processed those forms, they
17	leave?	17	would have been processed ultimately by you within
18	A I don't know.	18	the Mayor's office; correct?
19	Q Well, you testified that you have at least on three	19	A They would have been given to me, yes.
20	occasions	20	Q All right. Do you recall getting any information
21	A Yes.	21	regarding Marilyn's medical leave from Mr. Soika at
22	Q issued those forms to other employees?	22	any point after she left, other than the email that
23	A Yes.	23	you just read in this record?
24	Q ls that correct? With respect to I believe you	24	MR. TOKUS: Did you understand the
25		25	question?
		1	1
	62	İ	64

Deposition of PATRICIA A. STAWICKI 3/14/02 Case Compress A No. A Okay. 2 2 Q What about -- is there anything on request No. 2 Q And tell me if you are familiar with those records. 3 3 that would apply to you? 4 A No. 4 O Did you bring all of the records that you identified 5 5 Q Let's go to request No. 14 I believe. that apply to you pursuant to the subpoena? And I 6 6 believe let's go over request No. 1. 7 7 Q What aspects would apply to you? A 1? Okay. 8 8 A The things that you gave me right now, the sick Q What records do you believe apply to you under 9 9 leave, vacation time. request No. 1? 10 Q Okay. Anything else? 10 A If there were any job descriptions, they might have 11 A No. 11 been in the personnel file. Most people don't have 12 12 Q Let's go to request No. 16. job descriptions. I don't think I have any 13 A If there were any records, they would be in their 13 performance reviews in the personnel file. There 14 14 personnel file. might be disciplinary actions. There might be some 15 15 Q And you're addressing request No. 16? memoranda and notes. There might be complaints. 16 A Yes, I am. 16 I'm not sure. 17 Q What aspects? 17 Q Anything else? Are we still under question No. 1? 18 18 A Yes. It could be promotions, job reclassification A Medical records related to any medical leave. 19 Q Anything else on request No. 16 that would apply to 19 information, demotions. I don't recall any of 20 20 you? those. Suspensions, I don't recall any of those. 21 A No. 21 Sick leave information might be in there. There 22 22 might be a letter of commendation. Employee Q Let's go to request No. 17. 23 23 A Okay. I do payment certifications. So I would have certifications might be in there. Workshop 24 those expense records if they were submitted to me. 24 conference information. There might be some payroll 25 25 Q What is payment certifications? records in there. 69 1 1 As I said, some people have job descriptions, 2 2 so there might be revisions in there. I'm not sure. 3 3 incurred by them. Reclassification recommendations, promotional 4 4 recommendations might be in there, denials might be 5 5 that works within the Mayor's office? in there, family leave records would be in there. I 6 6 don't think there's inner office -- well, there A If they had requested reimbursement by the City. 7 7 Q Anything else that would apply to you pursuant to might be some interoffice and intraoffice memoranda, 8 8

I know there are no block grant assignments in there. I don't know if anyone ever received a performance award.

Letters from public block grant recipients, no. There might be complaints from the public if the public complained about a certain person. I don't think there's any documents, notes or papers regarding communication between John Norquist and Marilyn.

- 18 Q Anything else?
- A No.

9

10

11

12

13

14

15

16

17

- 20 Q Let's go to request No. 2.
- 21
- 22 Q What aspects would apply to you?
- 23 A I only have their personnel files. Whether there
- are other files around, I don't know. 24
- 25 Q Do you know of any?

70

- A It's just authorization to repay a person for money spent for various travel or expenses that were
- Q And you would keep all of those records for anyone
- request No. 17?
- 9 A Any bill that's submitted against the City I would 10 submit it, be it travel or it could be for services 11 rendered.
- 12 Q What about --
- 13 A Postage, telephone.
- 14 Q Telephone?
- 15 A Telephone bill, yes, supplies.
- 16 Q How long do you keep those records?
- 17 A I believe that I keep them four years, current and 18 four years or current and five years. I'm not sure.
- 19 Q Anything else under request No. 17?
- 20 A No.
- 21 Q Let's go to request No. 35.
- 22 A All of the information from A to I would be in their 23 personnel file if it were given to me, promotions,
- 24 demotions, reclassifications.
- 25 Q Let's go to request No. 47.

72

	Cas	ec	Compress Deposition of PATRICIA	4 A.		
Γ	1		the state of the record.	1	Α	I filled out the forms, I gave them to the employee
	2	0	I'm sorry, it has nothing to do with you.	2		and they brought in a doctor's excuse.
	3	Λ	I filed this form, put it on the computer.	3	0	Okay, very good. This form that you completed,
		^	Let's go back before you completed that form.	4	`	other than having now on computer, was the process
	4		-	5		pretty much the same? You fill out the form, give
	5	A	Okay.	6		it to the employee and the employee will get the
	6	Q	You believe you spoke to someone at employee			
	7		relations; is that correct?	7	٨	medical form?
	8		I think I did.	8	A	I'm not sure whether they required the paper form
Ì	9	Q	Do you know who you spoke to?	9		anymore. I'm not positive. But I did file this
	10		No.	10		form which I was told to file, and that's when
	11	Q	Do you know what the discussion was all about?	11		Marie Pettigrew called me and said she could not
	12	A	If I spoke to someone, it was to ask them what the	12		process the form unless a doctor's excuse was
	13		instructions were for doing this.	13		submitted.
	14	О	Before you who, if anyone, instructed you to call	14	Q	And you testified previously that you were surprised
	15	`	them?	15		when she told you that? Why were you surprised?
	16	Α	Probably no one. I probably did it on my own.	16	Α.	I don't know.
	17		What prompted you to do that?	17	Q	It was unusual?
- 1	18		I generally always do it to make sure that I have	18	À	No.
ı	19	,,	the correct documents.	19	0	What caused
i	20	\cap	And so what did you think you were required to do	20	•	I guess I was surprised that maybe I hadn't thought
	21	Ų	after you spoke to people from employee relations?	21		of this.
	22	۸	To file this form here.	22	0	When you processed that form, is it fair and
	23		Okay, file the family leave form?	23	`	accurate to say that the information that you
١	24		Correct.	24		plugged in that form is the information that
1	25		Is that correct?	25		Mr. Soika provided to you?
- 1	23	Ų	77			79
- 1			11			, •
	<u> </u>			4		
	1		Yes.	1	A	Mr. Soika asked me when her, Marilyn's vacation and
	2		Yes. Was that the practice that you would be the person	2	Α	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told
	2 3		Yes.	2	Α	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she
	2 3 4	Q A	Yes. Was that the practice that you would be the person to complete the form? Yes.	2 3 4	A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should
	2 3	Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past	2 3 4 5		Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave.
	2 3 4 5 6	Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes.	2 3 4 5 6		Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to
	2 3 4 5	Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes. before filing the form did you get to talk to the	2 3 4 5 6 7	Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation?
	2 3 4 5 6	Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first?	2 3 4 5 6 7 8	Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all
	2 3 4 5 6 7	Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and	2 3 4 5 6 7 8 9	Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either.
	2 3 4 5 6 7 8	Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee.	2 3 4 5 6 7 8 9	Q A Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can
	2 3 4 5 6 7 8 9	Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and	2 3 4 5 6 7 8 9 10	Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can
	2 3 4 5 6 7 8 9	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the	2 3 4 5 6 7 8 9 10 11	Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can — Do you have time cards? Let me see if I can help you here.
	2 3 4 5 6 7 8 9 10	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for
	2 3 4 5 6 7 8 9 10 11 12	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority.	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification)
	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office
	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification)
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct. Is that correct? And then the steps that you would	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes. who do they request the vacation from?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct. Is that correct? And then the steps that you would follow would be to complete the form?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes. who do they request the vacation from? Their superior.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct. Is that correct? And then the steps that you would follow would be to complete the form? Well, in the past we didn't have a computer system,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes. who do they request the vacation from? Their superior. And then the superior approves it one way or
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct. Is that correct? And then the steps that you would follow would be to complete the form? Well, in the past we didn't have a computer system, so it has changed a little bit. When Ruth	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q A Q A Q A Q A Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes. who do they request the vacation from? Their superior. And then the superior approves it one way or another?
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct. Is that correct? And then the steps that you would follow would be to complete the form? Well, in the past we didn't have a computer system, so it has changed a little bit. When Ruth	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes. who do they request the vacation from? Their superior. And then the superior approves it one way or another? Yes. If they came to me and requested vacation, I would tell them has it been cleared through whoever
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q A	Yes. Was that the practice that you would be the person to complete the form? Yes. And pursuant to that practice, in the past Yes before filing the form did you get to talk to the employee first? The employee always went to their superior and requested this. I didn't talk to the employee. They did not tell me specifically So the practice would be that the Well, Ruth came to me and said, hey, I want to be on family leave, but I don't grant that authority. They have to go to whoever their superior is first. So the practice would be that you would get that directive from the supervisor? Correct. Is that correct? And then the steps that you would follow would be to complete the form? Well, in the past we didn't have a computer system, so it has changed a little bit. When Ruth	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q A Q A Q A Q A Q A Q A	Mr. Soika asked me when her, Marilyn's vacation and sick leave ran out. And I figured it out. I told him. And he said after that time Marilyn said she was going to send in a doctor's excuse and I should put her on family leave. So for how long was Marilyn Figueroa, according to your records, for how long was she on vacation? I don't have her time card here. I don't have all the sick leave and vacation reports here either. Well, let me see if I can Do you have time cards? Let me see if I can help you here. (Exhibit No. 6 marked for identification) Ms. Stawicki, when somebody from the Mayor's office requests vacation Yes. who do they request the vacation from? Their superior. And then the superior approves it one way or another? Yes. If they came to me and requested vacation, I

don't report comp time. Q And you as the record keeper — A Yes. A Yes. A Yes. O So she was working what, full-time, part-time? A Yes, yes. Q Six hours a day? A Yes, yes. Q Six hours a day. A Yes, yes. Q Where would I find that, ma'am? A What the rate is? A When the rate is? A What the rat	Ca	SE (compress Deposition of ATMOR	~ <i>/</i>	<u> </u>	ATTORI OTTATOL
3 Å Yes. 4 Q do you know if Marilyn was working 40 hours for the Mayor's office, or let me strike that. Was she getting paid 40 hours from the City in January of 2000? I believe she was. Let me 10 ke. Yes. 5 A In January of 2000? I believe she was. Let me 10 look. Yes. 6 Q And in December of 1999 was she getting paid 40 hours? 8 A No, no. 7 A No, no. 8 A Oh, wait. I figured vacation time in there. I think as opposed to like 172. However, I figured some wacation time in there. I didn't deduct for helidays and vacation, but I gave her the six hours based on the pro rated time, and on ther her six hours. 9 A Yes. 9 Q So she was working what full-time, part-time? 10 A of thours per pay period? 11 A Correct. 12 Q What was she doing with the other two hours? 13 A I don't know. 14 Q And does the City have a pro rated type of policy in place? 15 A Yes. 16 Q Where would I find that, ma'am? 17 A Yes work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours, I if you put in 80 hours, I if you put in 80 hours. If you put in	1		don't report comp time.	1		
 Q — do you know if Marilyn was working 40 hours for the Mayor's office, or let me strike that. Was she getting paid 40 hours from the City in January of 2000? A lin January of 2000? I believe she was. Let me look. Yes. Q And in December of 1999 was she getting paid 40 hours? A No, no. Q What was she gelting paid in December of 1999? A 60 hours per pay period. Q Dest hat include ~ how many weeks are we talking per pay period. Q Two weeks? A Yes. Q So she was working what, full-time, part-time? A She was on what they call pro rated time. She was working six hours a day approximately. Q Six hours? A Correct. Q What was she doing with the other two hours? A I don't know. A I don't know. A I you work eight hours a day, you get — you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 160 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 160 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in 60 hours, you don't get the 3.7. They pro rate it just on,	2	Q	And you as the record keeper		Α	
the Mayor's office, or lef me strike that. Was she getting paid 40 hours from the City in January of 2000? A In January of 2000? I believe she was. Let me look, Yes. O And in December of 1999 was she getting paid 40 hours? A No, no. O What was she getting paid in December of 1999? A 60 hours per pay period. O Does that include – how many weeks are we talking per pay period? A Two weeks? O Ywo weeks? O Ywo weeks? A Yes was working what, full-time, part-time? A She was on what they call pro rated time. She was working six hours a day approximately. O Six hours? A Yes, yes. A Correct. O What was she doing with the other two hours? A Yes, yes. O Q Sight hours, yeu don't get the 37. They pro rate it just on, based on the figures, the actual time you put in. A Yes, yes. O Right. A In January of 2000? I believe she was. Let me look yes. A yes, yes. A lonk that rate is? A Nowember 1st she went into the pro rated time? A Ily you work eight hours a day, you get – you accumulate 3.7 of an hour for vacation time in there. I think as opposed to low many hours? A lift of the actual from the provided some vacation time in there. I didn't deduct for holddays and vacation, but I gave her the six hours hased on the pro rated time, and on the other figure I gave you the eight hours. I Roght. You gave me 132 hours of pro rated time for November 1999? A I think I said 172. A And I'm only basing that on quickly going through this material. O Do you know whoe lase was paying for her, the rest of her hours? A Yes, yes. O Where would I find that, ma'am? A Yes, yes. O Right. A I fly you work eight hours a day, you get – you accumulate 3.7 of an hour for vacation time over a two-week period. A Uh-huh. O Do you know when Marilyn went into pro rated time? A Ily you work eight hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in. O Nowell the rest is for the actual hours worked. O Do you know when Marilyn went into pro rated time? A Ily you work eight hours a d	3			3		
6 getting paid 40 hours from the City in January of 7 2000? 8 A ln January of 2000? I believe she was. Let me 9 look. Yes. 9 And in December of 1999 was she getting paid 10 Q And in December of 1999 was she getting paid 11 40 hours? 12 A No, no. 13 Q What was she getting paid in December of 1999? 14 A 60 hours per pay period. 15 Q Does that include how many weeks are we talking 16 per pay period. 17 A Two weeks. 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 A Yes, yes. 27 Q Myhat was she doing with the other two hours? 28 A I don't know. 4 Q And does the City have a pro rated type of policy in 29 place? 6 A Yes, yes. 6 A Yes, yes. 7 Q Night. 7 A Im gone when Manilyn went into pro rated time? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you 11 accumulate 3.7 of an hour for vacation time over a 12 two-week period. That's if you put in 60 hours, you don't get the 3.7. They 14 pro rate it just on, based on the figures, hours and you have working full-time, how many hours was on 15 you put in 60 hours, you don't get the 3.7. They 16 Q Do you know when Marilyn went into pro rated time? 17 A Im going to say November 18st new ent into the pro rated time? 18 A What the rate is? 19 Q Right. 10 A If you work eight hours a day, you get you 11 accumulate 3.7 of an hour for vacation time over a 12 two-week period. That's if you put in 60 hours, you don't get the 3.7. They 18 pro rate it just on, based on the figures, hours and the figures, hours and you know during the years that you have been 18 vowewels? 19 A So in November 18st new ent into the pro rated time? 20 Do you know when Marilyn went into pro rated time? 21 two-weeks period. That's if you put in 60 hours, you don't get the 3.7. They 21 pro rate it just on, based on the figures, hours and the other two hours? 22 A In the entire month of November? 23 A In the enti	4	Q	do you know if Marilyn was working 40 hours for		•	·
7 A Nave been how many hours? 8 A In January of 2000? I believe she was. Let me 9 look. Yes. 10 Q And in December of 1999 was she getting paid 11 40 hours? 12 A No, no. 13 Q What was she getting paid in December of 1999? 14 A 60 hous per pay period. 15 Q Does that include – how many weeks are we talking per pay period? 16 Q Two weeks? 17 A Two weeks. 18 Q Two weeks? 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 What was she doing with the other two hours? 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 25 A I don't know. 26 A Yes, yes. 27 Q Where would I find that, ma'am? 28 A What the rate is? 39 Q Right. 30 Q Hours and your provided time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you you tin. 30 Q How work epithours a day, you get – you provided in the provided time? 31 A If you work eight hours a day, you get – you provided it is not for vacation time in there. I think as opposed to like 172. However, I figured some vacation time in there. I didn't deduct for hother is kincurs based on the right hours. If you put in 80 hours. If you put in 80 hours. If you put in 80 hours, If you put in 80 hour	5		the Mayor's office, or let me strike that. Was she	5		
8 A In January of 2000? I believe she was. Let me 9 look. Yes. 100 And find December of 1999 was she getting paid 40 hours? 2 A No, no. 13 Q What was she getting paid in December of 1999? 14 A 60 hours per pay period. 15 Q Does that include - how many weeks are we talking per pay period. 16 Q Does that include - how many weeks are we talking per pay period. 17 A Two weeks. 18 Q Two weeks. 18 Q Two weeks. 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 Q D72. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 25 Q Six hours a day? 26 Six hours a day? 26 Six hours a day? 27 A In the native you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual lime you put in. 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 60 hours, sou don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 60 hours, sou don't get the 3.7. They pro rate it just on, based on the figures the four in the pro rated time. 50 A Counting full-time also? 4 No, not to me. 2 What about then on January 4th he poking to say Powerber? 1999. 2 As of November 1st, 1999. 3 A figure full-time also? 4 No, not to me. 2 What about then on January 10th, 11th and I believe part of January 10th, 11th and I believe part of January 10th, 11th and I believe part of January 10th, 11th and I believe part of January 10th, 11th and I believe part of January 10th, 11th and I believe part of Janua	6		getting paid 40 hours from the City in January of	6	Q	As opposed to how many hours, regular time would
1			0 0.	7		
1 look. Yes. 1 A No. no. 1 A 60 hours? 1 A 7 wo weeks. 2 D 2 So she was working what, full-time, part-time? 2 A 7 weeks? 3 A Yes. 2 O 3 Six hours a day approximately. 2 O 5 Six hours a day? 3 A 1 don't know. 4 A Correct. 5 O 2 What was she doing with the other two hours? 5 A 1 don't know. 6 A Yes, yes. 7 O 2 Where would I find that, ma'am? 8 A What the rate is? 9 O Right. 1 A 1 you work eight hours a day, you get - you accumulate 3.7 of an hour for vacation time over a tro-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the pro rated time. 1 A 1 I you work eight hours a day, you get - you accumulate 3.7 of an hour for vacation time over a tro-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the girure in the net. I didn't know working what, full-time, part-time? 2 A 1 I think I said 172. 2 O 172. 2 I A And I'm only basing that on quickly going through this material. 3 O So the City would then deduct from her pay the differential of hours that she did not work? 4 A Yes. 4 A Yes. 5 O Six hours a day? 5 O Where would I find that, ma'am? 5 A What the rate is? 6 O Where would I find that, ma'am? 7 A I don't know. 7 O Where would I find that, ma'am? 8 A What the rate is? 9 O Right. 1 O Do you know when Marilyn went into pro rated time? 1 O Do you know when Marilyn went into the pro rated time? 2 O A Yes, yes. 3 O O So she City hours that she did not work? 4 O Rowember? 5 O Rowember Ist steewent into the pro rated time? 6 A Yes, yes. 7 O Where would I find that, ma'am? 8 A What the rate is? 9 O Right. 1 O Do you know when Marilyn went into pro rated time? 1 O Do you know when Marilyn went into pro rated time? 2 O Rowember? 3 A I think of any just - O Nowell them deduct from her pay the differential of hours that she did not work? 5 O Rowember Ist steep went into the pro rated time? 6 O Do you know when Marilyn was on sick leave. 7 O When the rate is? 8 O Rowember Is	8	Α	In January of 2000? I believe she was. Let me	8	Α	Oh, wait. I figured vacation time in there. I
40 hours? 12 A No, no. 13 Q What was she getting paid in December of 1999? 14 A 60 hours per pay period. 15 Q Does that include how many weeks are we talking per pay period? 16 A Two weeks. 17 A Two weeks. 18 Q Two weeks? 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 She was she doing with the other two hours? 27 A She would only get paid for the actual hours worked. 28 A Yes, yes. 29 Q What was she doing with the other two hours? 30 A I don't know. 41 Q And does the City have a pro rated type of policy in place? 42 A Yes, yes. 43 Q Where would I find that, ma'am? 44 A What the rate is? 45 Q Six hours a day, you get - you accumulate 37 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 37. They pro rate it just on, based on the fire alta, hour was he eight hours. 46 A Yes, yes. 47 Q Where would I find that, ma'am? 48 A What the rate is? 49 Q Right. 40 Poy ou know when Marilyn went into pro rated time? 41 A If you work eight hours a day, you get - you accumulate 37 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, look actual fine you put in. 40 Q Do you know when Marilyn went into pro rated time? 41 A If you work when Marilyn went into pro rated time? 42 A What the rate is? 43 A I don't know for a fact. No, I don't. 44 Q And does the City have a pro rated type of policy in place? 45 A Yes, yes. 46 A Yes, yes. 47 Q Where would I find that, ma'am? 48 A What the rate is? 49 Q Right. 40 A If you work when Marilyn went into pro rated time? 41 A If you work when Marilyn went into pro rated time? 42 A Counting full-time also? 43 A I do'th know for a fact. No, I don't know during the years that you have been working full-time, how many hours was no vacaiting to the work of the actual ho	1		* *	9		
11 40 hours? 12 A No, no. 13 Q What was she getting paid in December of 1999? 14 A 60 hours per pay period. 15 Q Does that include how many weeks are we talking per pay period? 16 Q Does that include how many weeks are we talking per pay period? 17 A Two weeks. 18 Q Two weeks. 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 Six hours a day? 27 A Correct. 2 Q What was she doing with the other two hours? 28 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 2 Q What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 4 A Yes, yes. 5 Q Where would I find that, ma'am? 5 A What the rate is? 6 Q Where would I find that, ma'am? 7 A I myou work eight hours a day, you get - you accumulate 3.7 of an hour for vacation time over a two-week period. Thart's if you put in 80 hours. If you put in 60 hours, but accumulate 3.7 of an hour for vacation time over a two-week period. Thart's if you put in 80 hours. If you put in 60 hours, but accumulate 3.7 of an hour for vacation time over a two-week period. Thart's if you put in 80 hours. If you put in 60 hours, but accumulate 3.7 of an hour for vacation time over a two-week period. Thart's if you put in 80 hours. If you put in 60 hours, If you put in 60 hours, If and that you have been records, November 1st according to these records, November 1st, 1999. 19 Q As of November 1st, 1999. 20 Q How many hours was she putting in in the month of November? 21 A In the entire month of November? 22 A In the entire month of November? 23 A In the entire month of November? 24 Q Right. 25 C Ountling full-time also? 26 Double impose any conditions or limitations? 27 A Mr. Soika. 28 Q And who instructed you to place her on vacation at that time? 29 Q Right. 20 Q Sight was she potting in in the mo	10	Q	And in December of 1999 was she getting paid	10		
12 A No, no. 13 Q What was she getting paid in December of 1999? 14 A 66 hours per pay period. 15 Q Does that include how many weeks are we talking 16 per pay period? 17 A Two weeks. 18 Q Two weeks? 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 A Ves, 27 Q What was she doing with the other two hours? 27 A I don't know. 28 A What was she doing with the other two hours? 29 A Yes, 29 Q What was she doing with the other two hours? 20 Q Right. 21 A Correct. 22 Q What was she doing with the other two hours? 23 A I don't know. 24 Q Yes, yes, 29 Q Right. 25 Q Six hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours, you don't get the 3.7. They por rate it just on, based on the figures, the actual time you put in. 26 Q Doy w know who else was paying for her, the rest of before? 27 A I'm going to say November 1st, 1999. 28 Q As of November 1st, 1999. 39 Q As of November 1st, 1999. 40 Q How many hours was she pequired to 40 Q How hours who else was paying that on quickly going through this material. 41 Q Doy ou know who else was paying for her, the rest of her hours? 42 A Yes. 43 Q Doy ou know who else was paying for her, the rest of her hours? 44 A Yes when the other two hours? 45 A Yes, yes. 46 A Yes, yes. 47 Q Where would I find that, ma'am? 48 A What the rate is? 49 Q Right. 40 A Yes yes. 51 A Correct. 52 Q So hours was she doing with the other two hours? 53 A I don't know. 54 Q Nover week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They poor rate it just on, based on the figures, the actual time you put in. 54 C you know who else was paying for her, the rest of her hours? 55 Q So for the City would then deduct from her pay the differential of hours that she did not work? 56 A Yes, yes. 79 Q Whet work eight hours a day, you get you acc	1	`		11		
13 Q What was she getting paid in December of 1999? 14 A 60 hours per pay period. 15 Q Does that include how many weeks are we talking per pay period? 16 A Two weeks. 17 A Two weeks. 18 Q Two weeks. 18 Q Two weeks. 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 So she was she doing with the other two hours? 27 A Two weeks. 28 A Yes. 29 Q What was she doing with the other two hours? 29 A Yes, yes. 20 Q What was she doing with the other two hours? 20 A Yes, yes. 21 Q Right. 22 A What the rate is? 23 A I don't know. 24 A Yes, yes. 25 Q Right. 26 A What the rate is? 27 Q Right. 28 A What the rate is? 39 Q Right. 30 A I for work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 30 Q Do you know when Marilyn went into pro rated time? 31 A I'm going to say November 1st according to these records, November? Ist she went into the pro rated time? 32 A Uh-huh. 33 Q I'm weeks. 34 Q I'm going to say November 1st according to these records, November 1st she went into the pro rated time? 31 A I'm going to say November 1st she went into the pro rated time? 32 A Uh-huh. 33 Q I'm weeks into the pro rated time? 34 A Correct. 35 Q Six hours a day? 36 I don't know for a fact. No, I don't. 36 Q Do you know when Marilyn went into the pro rated time before? 37 A I don't know for a fact. No, I don't. 38 A What the rate is? 39 Q Right. 40 You go with fine the fine the form of vacation time over a two-week period. That's if you put in 80 hours. If hours, fine the form of vacation time over a two-week period. That's if you put in 80 hours. If hours, fine the fine form of the f	1	Α	No, no.	12		based on the pro rated time, and on the other figure
14 A 60 hours per pay period. 15 Q Does that include how many weeks are we talking per pay period? 16 A Two weeks. 17 A Two weeks. 18 Q Two weeks? 18 Q Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 Six hours a day? 27 A Correct. 2 Q What was she doing with the other two hours? 28 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 29 A Yes, yes. 20 Q Right. 20 A What the rate is? 21 A What the rate is? 22 Q Right. 23 Q Right. 24 A Yes actual time you put in. 25 A Uh-huh. 26 Q Dyou know who else was paying for her, the rest of her hours? 27 A Correct. 28 A What the rate is? 39 Q Right. 30 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 30 Q Dyou know Men Syou home yet the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 31 A I'm going to say November 1st according to these records, November 1st, 1999. 32 A Uh-huh. 34 I'm going to say November 1st according to these records, November 1st she went into the pro rated time? 35 A Uh-huh. 36 C Doy ou know when wharilyn went into pro rated time? 36 A Uh-huh. 37 A I'm going to say November 1st according to these records, November? 38 A In the entire month of November? 39 A In the entire month of November? 30 A In the entire month of November? 31 A In the entire month of November? 32 A In the entire month of November? 33 A In the entire month of November? 34 A Correct. 45 C Right. 56 C So be was on what they call pro rated time for November and the duct from her pay the differential of hours that she did not work? 46 A Yes, get. 47 C Right. You gave mee 132 hour hand the mass than was as her equived to				13		I gave you the eight hours.
15 Q Does that include how many weeks are we talking per pay period? 16 A Two weeks. 17 A Two weeks. 18 Q Two weeks? 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was working six hours a day approximately. 22 Q Six hours? 23 Q Six hours a day? 24 A Yes. 25 Q Six hours a day? 26 Six hours a day? 27 A I don't know. 28 A Un-huh. 28 A Correct. 2 Q What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 5 A Yes, yes. 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A I five work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A Two weeks. 18 Q How weeks. 18 Q I wheth was she required to 19 A I think I said 172. 2 Q 172. 2 1 A And I'm only basing that on quickly going through this material. 2 Q So the City would then deduct from her pay the differential of hours that she did not work? 2 A She would only get paid for the actual hours worked. 2 D you know who else was paying for her, the rest of her hours? 3 A I don't know. 4 Q And the now or a fact. No, I don't. 4 Q Do you know during the years that you have been working full-time, how many hours was she required to 2 A I think I said 172. 2 Q 172. 2 A And I'm only basing that on quickly going through this material. 2 Q So the City would then deduct from her pay the differential of hours that she did not work? 4 A She would only get paid for the actual hours worked. 5 Pa Counting full that, ma'am? 5 A I don't know or a fact. No, I don't. 6 D Do you know who else was paying for her, the rest of her hours? 7 A I don't know for a fact. No, I don't. 9 D you know during the years that you have been working full thim hours hours with the ord pay the means				14	Q	Right. You gave me 132 hours of pro rated time for
16				15		November 1999?
17 A Two weeks. 18 Q Two weeks? 19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 Yes hand I'm only basing that on quickly going through this material. 27 Q What was she doing with the other two hours? 28 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 4 A Yes, yes. 5 Q Where would I find that, ma'am? 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 A Im going to say November Ist according to these records, November Ist, 1999. 12 Q As of November Ist she went into the pro rated time? 13 A I think I said 172. 20 Q I72. 21 A And I'm only basing that on quickly going through this material. 21 Q So the City would then deduct from her pay the differential of hours that she did not work? 22 A She would only get paid for the actual hours worked. 23 A I don't know. 4 Q Do you know who else was paying for her, the rest of her hours? 24 A Yes, yes. 5 Q Where would I find that, ma'am? 6 A What ther ate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 11 Q Do you know when Marilyn went into pro rated time? 12 A I can't think of any just 13 Q Row let me go back to the times when Marilyn was on sick leave. 14 A Coday. 15 A Correct. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November Ist according to these	1	`		16	Α	Uh-huh.
18		Α		17	Q	If she had been working full-time, how many hours
19 A Yes. 20 Q So she was working what, full-time, part-time? 21 A She was on what they call pro rated time. She was 22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 Six hours a day? 27 A Correct. 2 Q What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 4 A Yes, yes. 7 Q What would I find that, ma'am? 8 A What the rate is? 9 Q Right. 1 A If you work eight hours a day, you get – you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November 1st according to these records, November 1st she went into the pro rated time? 18 A Uh-huh. 19 Q How many hours was she putting in in the month of November? 20 A I In the entire month of November? 21 Q Right. 22 Q 172. 24 A I think I said 172. 25 Q 172. 26 A I think I said 172. 26 Q 172. 27 A And I'm only basing that on quickly going through this material. 28 Q So the City would then deduct from her pay the differential of hours that she did not work? 29 A Se would only get paid for the actual hours worked. 20 Do you know who else was paying for her, the rest of her hours? 3 A I don't know for a fact. No, I don't. 4 Q Do you know during the years that you have been working for the Mayor's office, do you know and working for the Mayor's office, do you know and are time before? 3 A I can't think of any just 9 Q No? All right. 4 No to off the top of my head. Q Now let me go back to the times when Marilyn was on sick leave. 19 Q As of January 5th, 6th and 7th she was on vacation; is that correct? 19 Q And who instructed you to place her on vacation at that time? 20 A Uh-huh. 21 A In think I said 172. 22 Did he impose any conditions or limitations? 23 A No, not to me. 24 Q What at the rate is! 25 Q So for November? 2	•			18		was she required to
A She was on what they call pro rated time. She was working six hours a day approximately. Q Six hours? A Yes. So What was she doing with the other two hours? A I don't know. Q And does the City have a pro rated type of policy in place? A What the rate is? Q Right. A What the rate is? Q Right. A Woweke period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. Q Do you know when Marilyn went into pro rated time? A I'm going to say November 1st she went into the pro rated time? A Uh-huh. Q How many hours was she putting in in the month of November? A I nhe entire month of November? A Counting full-time also? A She would only get paid for the actual hours worked. 87 A She would only get paid for the actual hours worked. 87 A Do you know who else was paying for her, the rest of her hours? A I don't know. Q Do you know who else was paying for her, the rest of her hours? A I don't know for a fact. No, I don't. Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? A I can't think of any just Q Nov let me go back to the times when Marilyn was on sick leave. A Okay. Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. A No, not to me.		À	Yes.	19	Α	I think I said 172.
22 working six hours a day approximately. 23 Q Six hours? 24 A Yes. 25 Q Six hours a day? 26 A Correct. 27 Q What was she doing with the other two hours? 28 A I don't know. 39 A I don't know. 40 And does the City have a pro rated type of policy in place? 41 A What the rate is? 42 Q Right. 43 A I don't know for a fact. No, I don't. 44 Q Do you know who else was paying for her, the rest of her hours? 45 A What the rate is? 46 A What the rate is? 47 Q Right. 48 A What the rate is? 49 Q Right. 40 A If you work eight hours a day, you get — you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 40 Q Do you know when Marilyn went into pro rated time? 41 A I'm going to say November 1st according to these records, November 1st she went into the pro rated time? 41 A I'm going to say November 1st she went into the pro rated time? 42 A Uh-huh. 42 Q How many hours was she putting in in the month of November? 43 A I conting full-time also? 44 Counting full-time also? 45 A What about the deduct from her pay the differential of hours that she did not work? 46 A Yes. yes. 47 A Correct. 48 A I don't know for a fact. No, I don't. 49 Q Do you know who else was paying for her, the rest of her hours? 41 A I don't know for a fact. No, I don't. 40 Q Do you know during the years that you have been working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for the Mayor's office, do you know working for her, the rest of her hours? 48 A I can't	20	Q	So she was working what, full-time, part-time?	ı	_	·
Q Six hours? A Yes. So Q Six hours a day? 85 1 A Correct. Q What was she doing with the other two hours? A I don't know. Q And does the City have a pro rated type of policy in place? A Yes, yes. Q Where would I find that, ma'am? A What the rate is? Q Right. Q And work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. Q Do you know who else was paying for her, the rest of her hours? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say November 1st she went into the pro rated time? A I'm going to say Novemb	21	A	She was on what they call pro rated time. She was		Α	, , , , , ,
24 A Yes. 25 Q Six hours a day? 26 What was she doing with the other two hours? 27 A I don't know. 28 A I don't know who else was paying for her, the rest of her hours? 29 A I don't know. 30 A I don't know. 40 Q And does the City have a pro rated type of policy in place? 40 A Yes, yes. 41 Q Where would I find that, ma'am? 42 A What the rate is? 43 A I fy ou work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 41 Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time? 42 A I'm going to say November 1st according to these records, November 1st, 1999. 43 A I'm going to say November 1st she went into the pro rated time? 44 Q How many hours was she putting in in the month of November? 45 A In the entire month of November? 46 A Yes, yes. 47 A I'm going to say November 1st according to these records, November 1st he went into the pro rated time? 48 A What the rate is? 49 Q Right. 50 A Okay. 51 A I don't know who else was paying for her, the rest of her hours? 52 A I don't know for a fact. No, I don't. 53 A I don't know for a fact. No, I don't. 54 Q Noy a know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 54 A What the rate is? 55 A Counting full-time also? 55 A Counting full-time also? 56 A Yes, yes. 66 A Yes, yes. 67 A I don't know for a fact. No, I don't. 69 Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 68 A I can't think of any just 69 Q Nov elte me go back to the times when Marilyn was on sick leave. 69 A Okay. 60 A Okay. 61 A Okay. 61 A Okay. 61 Can't think of any just 60 Now elte me go back to the time	22		working six hours a day approximately.			
25 Q Six hours a day? 85 1 A Correct. 2 Q What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 5 place? 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 A Correct. 2 Q Mo? All right. 3 A I don't know for a fact. No, I don't. 4 Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 4 A Lean't think of any just Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 12 A Okay. 13 A I don't know. 14 Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 4 A Loan't think of any just Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 12 A Okay. 13 A I don't know for a fact. No, I don't. 14 Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time? 14 A Lean't think of any just Q No? All right. 15 A Cown let me go back to the times when Marilyn was on sick leave. 16 A Okay. 17 A Not off the top of my head. 18 A Okay. 19 A Okay. 20 A Okay. 21 A Let's find that. January 4th looking at the records, I believe that January 5th, 6th and 7th vacation. 22 A Mr. Soika. 23 A In the entire month of November? 24 A Mr. Soika. 25 A No, not to me. 26 Q What about then on January 10th, 11th and I believe part of January 12th	23	Q	Six hours?		Q	
1 A Correct. 2 Q What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 5 place? 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November Ist according to these records, November 1st she went into the pro rated time? 18 A Uh-huh. 21 Q How many hours was she putting in in the month of November? 22 A In the entire month of November? 23 A I nthe entire month of November? 24 Q Right. 25 A Counting full-time also? 1	24	Α	Yes.			
1 A Correct. 2 Q What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A I you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 Ye work eight hours a day, you get you throw-week period. That's if you put in 80 hours. If you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 11 A lon't know for a fact. No, I don't. 12 Q Noyou know during the years that you have been working for the Mayor's office, do you know any other ime when Marilyn went into the pro rated time before? 12 A Okay. 13 A I don't know for a fact. No, I don't. 14 Q Do you know during the years that you have been working for the Mayor's office, do you know any other ime when Marilyn went into the pro rated time before? 14 A Not off the top of my head. 15 A Okay. 16 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 18 Q How many hours was she putting in in the month of November? 19 Q And who instructed you to place her on vacation at that time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of November? 22 A In the entire month of November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also?	25	Q		25	Α	She would only get paid for the actual hours worked.
2 What was she doing with the other two hours? 3 A I don't know. 4 Q And does the City have a pro rated type of policy in place? 5 Page 2 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November 1st according to these records, November 1st she went into the pro rated time? 18 A Uh-huh. 19 Q How many hours was she putting in in the month of November? 20 A In the entire month of November? 21 A Counting full-time also? 22 Nor All right. 23 A I don't know for a fact. No, I don't. 4 Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 4 I can't think of any just 9 Q No? All right. 10 A Not off the top of my head. 11 A Not off the top of my head. 12 A Okay. 13 A Okay. 14 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 15 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 16 Q How many hours was she putting in in the month of November? 26 A In the entire month of November? 27 A In the entire month of November? 28 A In the entire month of November? 29 Q Right. 20 Did he impose any conditions or limitations? 20 A No, not to me. 21 Q What about then on January 10th, 11th and I believe part of January 12th			85			87
A I don't know. A I don't know. A Q And does the City have a pro rated type of policy in place? A Yes, yes. Where would I find that, ma'am? A What the rate is? Q Right. In A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. Q Do you know when Marilyn went into pro rated time? A I'm going to say November 1st according to these records, November 1st she went into the pro rated time? A Uh-huh. A I don't know for a fact. No, I don't. Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? A I can't think of any just 9 Q No? All right. A Not off the top of my head. Q Now let me go back to the times when Marilyn was on sick leave. A Okay. A Coway. A Coway. A Let's find that. January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. Q And who instructed you to place her on vacation at that time? A Mr. Soika. Q What about then on January 10th, 11th and I believe part of January 12th	1	Α	Correct.	1	Q	Do you know who else was paying for her, the rest of
4 Q And does the City have a pro rated type of policy in place? 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 A I'm going to say November 1st according to these records, November 1st, 1999. 11 Q As of November 1st she went into the pro rated time? 12 Q How many hours was she putting in in the month of November? 13 A Counting full-time also? 14 Q Do you know during the years that you have been working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 18 A I can't think of any just 9 Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 11 A Okay. 12 A Sof January 4th - looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 13 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 14 A Mr. Soika. 15 A Mr. Soika. 16 Q Did he impose any conditions or limitations? 17 A In the entire month of November? 18 A I can't think of any just 9 Q No? All right. 19 Q Now let me go back to the times when Marilyn was on sick leave. 11 A Okay. 12 A Okay. 13 A Okay. 14 Delieve that January 4th she put in eight hours, 5th, 6th and 7th vacation. 15 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 19 Q And who instructed you to place her on vacation at that time? 20 A Mr. Soika. 21 A No, not to me. 22 Q What about then on January 10th, 11th and I believe part of January 12th	2	Q	What was she doing with the other two hours?			
5 place? 6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 A I'm going to say November 1st according to these records, November 1st she went into the pro rated time? 10 A Uh-huh. 11 C How many hours was she putting in in the month of November? 12 A In the entire month of November? 13 A Counting full-time also? 15 working for the Mayor's office, do you know any other time when Marilyn went into the pro rated time before? 16 A I can't think of any just 9 Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 12 A Okay. 13 A Okay. 14 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 16 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 18 Q And who instructed you to place her on vacation at that time? 19 Q And who instructed you to place her on vacation at that time? 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 12 A Cokay. 13 A Okay. 14 Q As of January 4th looking at the records, I believe that January 4th she put in eight hours, 5th, 6th and 7th vacation. 16 Q I how many hours was she putting in in the month of November? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 18 Q And who instructed you to place her on vacation at that time? 19 Q And who instructed you to place her on vacation at that time? 20 A Mr. Soika. 21 Q Bid he impose any conditions or limitations? 22 A No, not to me. 23 A No, not to me. 24 Q Right. 25 What about then on January 10th, 11th and I believe part of January 12th	3			1		
6 A Yes, yes. 7 Q Where would I find that, ma'am? 8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 A I'm going to say November 1st according to these records, November 1st, 1999. 12 Q As of November 1st she went into the pro rated time? 13 Q How many hours was she putting in in the month of November? 14 Q Right. 15 A Counting full-time also? 16 Other time when Marilyn went into the pro rated time before? 18 A I can't think of any just 9 Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 12 A Okay. 13 A Okay. 14 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 15 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 16 Q How many hours was she putting in in the month of November? 17 A I'm going to say November 1st, 1999. 18 A Uh-huh. 19 Q As of November 1st she went into the pro rated time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of November? 22 A In the entire month of November? 23 A In the entire month of November? 24 Q Right. 25 What about then on January 10th, 11th and I believe part of January 12th	4	Q	And does the City have a pro rated type of policy in	1	. Q	
7	5		place?	i		
8 A What the rate is? 9 Q Right. 10 A If you work eight hours a day, you get you accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November 1st according to these records, November 1st, 1999. 19 Q As of November 1st she went into the pro rated time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of November? 22 A In the entire month of November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 8 A I can't think of any just 9 Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 13 A Okay. 14 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 19 Q And who instructed you to place her on vacation at that time? 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q Right. 25 What about then on January 10th, 11th and I believe part of January 12th	6	Α	Yes, yes.	1		
9 Q Right. 10 A If you work eight hours a day, you get you 11 accumulate 3.7 of an hour for vacation time over a 12 two-week period. That's if you put in 80 hours. If 13 you put in 60 hours, you don't get the 3.7. They 14 pro rate it just on, based on the figures, the 15 actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November 1st according to these 18 records, November 1st, 1999. 19 Q As of November 1st she went into the pro rated time? 10 A Uh-huh. 21 Q How many hours was she putting in in the month of 22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 9 Q No? All right. 10 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 12 A Not off the top of my head. 11 Q Now let me go back to the times when Marilyn was on sick leave. 13 A Okay. 14 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 19 Q And who instructed you to place her on vacation at that time? 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q Right. 25 Q What about then on January 10th, 11th and I believe part of January 12th	7	Q	Where would I find that, ma'am?	1		
10 A If you work eight hours a day, you get you 11 accumulate 3.7 of an hour for vacation time over a 12 two-week period. That's if you put in 80 hours. If 13 you put in 60 hours, you don't get the 3.7. They 14 pro rate it just on, based on the figures, the 15 actual time you put in. 16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November 1st according to these 18 records, November 1st, 1999. 19 Q As of November 1st she went into the pro rated time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of 22 Nowlet me go back to the times when Marilyn was on 12 sick leave. 13 A Okay. 14 Q As of January 4th looking at the records, I 15 believe that January 5th, 6th and 7th she was on 16 vacation; is that correct? 17 A Let's find that. January 4th she put in eight 18 hours, 5th, 6th and 7th vacation. 19 Q And who instructed you to place her on vacation at 20 that time? 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q Right. 25 A Counting full-time also? 26 What about then on January 10th, 11th and I believe 27 part of January 12th	8	Α	What the rate is?	1	Α	I can't think of any just
accumulate 3.7 of an hour for vacation time over a two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. 10 Q Do you know when Marilyn went into pro rated time? 11 A I'm going to say November 1st according to these records, November 1st, 1999. 12 As of November 1st she went into the pro rated time? 13 A In the entire month of November? 14 Q Now let me go back to the times when Marilyn was on sick leave. 15 A Okay. 16 Q As of January 4th looking at the records, I believe that January 5th, 6th and 7th she was on vacation; is that correct? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 18 Q And who instructed you to place her on vacation at that time? 20 A Mr. Soika. 21 Q Mow many hours was she putting in in the month of November? 22 A In the entire month of November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also?	9			1		
two-week period. That's if you put in 80 hours. If you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. Q Do you know when Marilyn went into pro rated time? A I'm going to say November 1st according to these records, November 1st, 1999. Q As of November 1st she went into the pro rated time? A Uh-huh. Q How many hours was she putting in in the month of November? A In the entire month of November? A Counting full-time also? 12		. A		1		
you put in 60 hours, you don't get the 3.7. They pro rate it just on, based on the figures, the actual time you put in. O Do you know when Marilyn went into pro rated time? If A I'm going to say November 1st according to these records, November 1st, 1999. O As of November 1st she went into the pro rated time? O A Uh-huh. O How many hours was she putting in in the month of November? A In the entire month of November? O Right. O A Counting full-time also? A Okay. A Delive that January 4th she put in eight hours, 5th, 6th and 7th she was on vacation; is that correct? A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. A Danuary 1th she put in eight hours, 5th, 6th and 7th vacation. A Mr. Soika. A No, not to me. A No, not to me. A No, not to me. A Okay.				I .	Q	
pro rate it just on, based on the figures, the actual time you put in. Q Do you know when Marilyn went into pro rated time? If a l'm going to say November 1st according to these records, November 1st, 1999. Q As of November 1st she went into the pro rated time? Q How many hours was she putting in in the month of November? A ln the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim the entire month of November? A lim going to say November 1st according to these vacation; is that correct? A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. A lim do lim the month of the pro rated time? A lim going to say November 1st according to these vacation; is that correct? A Let's find that. January 4th looking at the records, I the limit of the pro rated time? A lim going to say November 1st according to these vacation; is that correct? A Let's find that. January 4th looking at the records, I the limit of the pro rated time? A lim going to say November 1st according to these vacation; is that correct? A Let's find that. January 4th looking at the records, I the limit of the pro rated time? A lim going to say November 1st according to these vacation; is that correct? A Let's find that. January 4th looking at the records, I the limit of the pro rated time? A lim going to say November 1st according to these vacation. A lim going to say November 1st according to these vacation. A lim going to say Novem						
actual time you put in. 15						
16 Q Do you know when Marilyn went into pro rated time? 17 A I'm going to say November 1st according to these 18 records, November 1st, 1999. 19 Q As of November 1st she went into the pro rated time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of 22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 16 vacation; is that correct? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 19 Q And who instructed you to place her on vacation at that time? 20 A Mr. Soika. 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q What about then on January 10th, 11th and I believe part of January 12th				•	Q	
17 A I'm going to say November 1st according to these 18 records, November 1st, 1999. 19 Q As of November 1st she went into the pro rated time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of 22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 17 A Let's find that. January 4th she put in eight hours, 5th, 6th and 7th vacation. 19 Q And who instructed you to place her on vacation at that time? 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q What about then on January 10th, 11th and I believe part of January 12th						
records, November 1st, 1999. Q As of November 1st she went into the pro rated time? A Uh-huh. Hours, 5th, 6th and 7th vacation. A Uh-huh. Hours, 5th, 6th and 7th vacation. A Mr. Soika. November? A In the entire month of November? Right. Rounting full-time also? A November 1st, 1999. Rounting full-time also? A hours, 5th, 6th and 7th vacation. A Mr. Soika. D Did he impose any conditions or limitations? A No, not to me. What about then on January 10th, 11th and I believe part of January 12th				•		
19 Q As of November 1st she went into the pro rated time? 20 A Uh-huh. 21 Q How many hours was she putting in in the month of 22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 29 And who instructed you to place her on vacation at that time? 20 Amr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q What about then on January 10th, 11th and I believe part of January 12th			I'm going to say November 1st according to these		Α	
20 that time? 21 Q How many hours was she putting in in the month of 22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 20 that time? 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q What about then on January 10th, 11th and I believe part of January 12th	140	Α				house bith 6th and 7th vacation
21 Q How many hours was she putting in in the month of 22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 21 A Mr. Soika. 22 Q Did he impose any conditions or limitations? 23 A No, not to me. 24 Q What about then on January 10th, 11th and I believe 25 part of January 12th			records, November 1st, 1999.		_	
22 November? 23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 28 Q Did he impose any conditions or limitations? 29 Q Did he impose any conditions or limitations? 20 Q Did he impose any conditions or limitations? 21 Q What about then on January 10th, 11th and I believe part of January 12th	19	Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time?	19	Ç	And who instructed you to place her on vacation at
23 A In the entire month of November? 24 Q Right. 25 A Counting full-time also? 28 A No, not to me. 29 Q What about then on January 10th, 11th and I believe part of January 12th	19 20	Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time? Uh-huh.	19 20		And who instructed you to place her on vacation at that time?
24 Q Right. 25 A Counting full-time also? 26 Q What about then on January 10th, 11th and I believe part of January 12th	19 20 21	Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time? Uh-huh. How many hours was she putting in in the month of	19 20 21	Α	And who instructed you to place her on vacation at that time? Mr. Soika.
25 A Counting full-time also? 25 part of January 12th	19 20 21 22	Ç A Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time? Uh-huh. How many hours was she putting in in the month of November?	19 20 21 22	Ą	And who instructed you to place her on vacation at that time?Mr. Soika.Did he impose any conditions or limitations?
	19 20 21 22 23	Ç A Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time? Uh-huh. How many hours was she putting in in the month of November? In the entire month of November?	19 20 21 22 23	A C A	 And who instructed you to place her on vacation at that time? Mr. Soika. Did he impose any conditions or limitations? No, not to me.
86 88	19 20 21 22 23 24	Ç A Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time? Uh-huh. How many hours was she putting in in the month of November? In the entire month of November? Right.	19 20 21 22 23 24	A C A	 And who instructed you to place her on vacation at that time? Mr. Soika. Did he impose any conditions or limitations? No, not to me. What about then on January 10th, 11th and I believe
	19 20 21 22 23 24	Ç A Ç	records, November 1st, 1999. As of November 1st she went into the pro rated time? Uh-huh. How many hours was she putting in in the month of November? In the entire month of November? Right. Counting full-time also?	19 20 21 22 23 24	A C A	 And who instructed you to place her on vacation at that time? Mr. Soika. Did he impose any conditions or limitations? No, not to me. What about then on January 10th, 11th and I believe part of January 12th

1	Cas	e Compress Deposition of PATRICIA	<u> А А.</u>	ا ت	AWICKI 3/14/02 Sneet 24
2 A Right. 3 Q Is that correct? 4 A Right. 5 Q And as I understand, you would be the record keeper? 6 A Correct. 7 Q True? 8 A Yes. 9 Q And I believe a lot of those records are written in hand or by hand; is that correct? 10 I A I think all of them are. 11 Q And are those records records that you have prepared? 12 Q And are those records records that you have prepared? 13 A Correct. 14 A Correct. 15 Q Now, left stalk about those records as far as medical leave? 16 medical leave? 17 Q Left stalk about these proor is medical leave? 18 A You want all the dates in 1999? 19 A You want all the dates in 1999? 20 Q Yes. 21 A February 15th four hours: February 16th eight hours. 22 MR. TOKUS: Conneel, can we identify what she's reading from? 23 A Pow want all the dates in 1999? 24 A Yes. 25 March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - Q Dyou have a recollection with respect to these five days, March 22th this hours, 40 hours during March 22nd - Q Dyou have a recollection as to what happened on that week. 26 A No. 27 A No. 28 A Yes. 29 Q Hand a believe a lot of those records are written in hand or by hand; is that correct? 29 D A think all of them are. 20 A not are those records are written in hand or these them that the order of the expression of the work of the employee takes the time or when she returns? What's your practice? 20 D A Correct. 21 A February 15th four hours: February 15th eight hours. 32 A Correct. 34 A Correct. 35 A Correct. 46 Q Intel Mart Appened on that week. 47 A No. 48 No. 48 No. 49 A I throad day on record those hours, before the employee takes the time or when she returns? What's your practice? 40 A throad have put the 22nd. If she would not have been there on the 22nd, it would have added the 23rd and so on. Unless she called in prior to that time of days, March 22nd through the 26th, whether as one of the city of what she's reading from? 41 A You want all the dates in 1999? 42 A Yesh, total. Transpired to the city of what have recording from? 42 A Ye	1	kept within the confines of your office?	1	A	Correct.
3 Q Is in tat correct? 4 A Right. 5 Q And as I understand, you would be the record keeper? 6 A Correct. 9 Q True? 8 A Yes. 9 Q And I believe a lot of those records are written in hand or by hand; is that correct? 11 A I think all of them are. 12 Q And are those records records that you have prepared? 13 prepared? 14 A Correct. 15 Q Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave? 16 A Before January 4th? 17 A Vou want all the dates in 1999? 18 A February 15th four hours; February 16th eight hours. 19 A February 15th four hours; February 16th eight hours. 19 A February 15th four hours; February 16th eight hours. 10 A Yesh, ToKUS: Coursel, can we identify what she's reading from? 11 A I hand and the dates in 1999? 12 Q Yes. 13 A February 15th four hours; February 16th eight hours. 14 A February 25th sis hours, February 26th eight hours, March 18th and 19th each eight hours, 40 hours during March 22nd - Cloth on a second. Of 1999 were still; right? 18 A Yes. 19 Q Hold on a second. Did you say 40 hours? 20 Q Hold on a second. Did you say 40 hours? 21 Q The same thing for March 22nd, 23rd, 24th, 25th, 26th. 22 Q March 24th? 23 Q March 24th? 24 A Correct. 25 Q And stal of eight hours? 26 Q And then what essels would be the next step? 27 A Yes. 28 Q March 24th? 29 Q March 24th? 20 Q March 24th? 21 Q The same thing for March 23rd? 21 Q The same thing for March 23rd? 22 Q Correct. 23 Q March 24th? 24 A Correct. 25 Q March 24th? 26 Q March 24th? 27 A Correct. 28 Q March 24th? 29 Q March 24th? 20 Q Day is a wear a recollection with respect to these would directly? 29 A Correct. 20 Q Toy un have a recollection with respect to these would directly? 20 Q Toy in the staff assistants would call medirectly. 21 Q The same thing of March 23rd? 22 Q Toy on have an other would we week or two weeks or a month or whatever. 22 Q Toy on have an other would be the next step? 23 Q March 24th? 24 Q West and to the first of the fir	2	*	2	Q	March 26th?
4 A Right. Q And as I understand, you would be the record keeper? A Correct. Q True? A Yes. Q And I believe a lot of those records are written in hand or by hand; is that correct? A I think all of them are. Q And are those records records that you have prepared? A Correct. Q Now, let's talk about those records as far as medicial leave. Do you know prior to January 4th when was the last time that Marilyn requested any medicial leave? A Pow want all the dates in 1999? A Pow want all the dates			3	À	Correct.
5 Q And as I understand, you would be the record keeper? 6 A Correct. 7 Q True? 8 A Yes. 9 Q And I believe a lot of those records are written in hand or by hand; is that correct? 10 A I think all of them are. 11 A I think all of them are. 12 Q And are those records records that you have prepared? 13 prepared? 14 A Correct. 15 Q Now, let's talk about those records as a ras medical leave. Do you know prior to Jamuary 4th when was the last time that Marilyn requested any medical leave. Do you know prior to Jamuary 4th when was the last time that Marilyn requested any medical leave. 16 A Pébruary 15th four hours: February 16th eight hours. 17 A You want all the dates in 1999? 18 A February 15th four hours: February 16th eight hours. 19 A February 15th four hours: February 16th eight hours. 19 A February 15th four hours: February 16th eight hours. 10 A February 15th four hours: February 16th eight hours. 10 A February 15th four hours: February 16th eight hours. 11 A I know that they call Deanns at the front desk, the receptionist. I would think if they were going to be eight hours, 40 hours during March 22nd eight		· ·	4	0	Is that correct? Do you have any recollection as to
6 A Correct. 7 Q True? 8 A Yes. 9 Q And I believe a lot of those records are written in hand or by hand, is that correct? 11 A I think all of them are. 12 Q And are those records records that you have prepared? 13 A Correct. 14 A Correct. 15 Q Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. 19 A Before January 4th? 20 Q Let's talk about years. What about the year 1999: 21 A You want all the dates in 1999? 22 Q Yes. 23 A February 15th four hours; February 16th eight hours, darch 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - Q Hold on a second. Of 1999 we're still; right? 24 A Yes. 25 B A Yes. 26 Hold on a second. Of 1999 we're still; right? 28 A Yes. 29 Q Hold on a second. Of 1999 we're still; right? 30 T hat's for March of 1999? 31 A Yesh, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 31 Q That's for March of 1999? 32 A Correct. 33 Q March 24th? 34 A Correct. 35 Q On March - taking you step-by-step, March 22nd, see took a total of eight hours? 46 Q On March - taking you step-by-step, March 22nd, see took a total of eight hours? 47 A Yes. 48 A Wes. 49 A Uh-huh, yes. 40 Correct. 40 Correct. 41 A Correct. 41 A Correct. 41 A Correct. 41 A Room, All was a dead the 22nd, I would not have been there on the 22nd, I would not have been there the 23rd, I would have added the 22nd and son. Unless she called in prior to that time and said I'm sick, I wouldn't be in, I would have added the 22nd and son. Unless she called in prior to that time and said I'm sick, I wouldn't be in, I would have added the 22nd, I would h			5	`	· · · · · · · · · · · · · · · · · · ·
7 Q True? 8 A Yes. 9 Q And I believe a lot of those records are written in hand or by hand; is that correct? 11 A I think all of them are. 12 Q And are those records that you have prepared? 13 prepared? 14 A Correct. 15 Q Now, left stalk about those records as far as medical leave. Do you know prior to January 4th when was the last time blat Marilyn requested any medical leave? 16 A Before January 4th? 17 A You want all the dates in 1999? 18 A You want all the dates in 1999? 19 A February 15th four hours; February 16th eight hours. 20 Q Yes. 30 A February 25th six hours, February 26th eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - Q Hold on a second. Of 1999 we're still; right? 18 A Yes. 19 Q Hold on a second. Oid you say 40 hours? 20 Hold on a second. Oid you say 40 hours? 21 A Yesh, total. I'm going to give you five dates and a total of eight hours. March 22nd, 23rd, 24th, 25th, 26th. 21 Q That's for March of 1999? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 24th? 26 Q That's for March 23rd? 27 A Yes. 28 A Yes. 29 Q Hold on a second. Did you say 40 hours? 29 A Selection of those hours, before the employee takes the time or when she returns? What's your practice? 29 A You want all the dates in 1999? 20 A Selection of those hours, before the employee takes the time or when she returns? What's your practice? 20 Cokay. 21 A You want all the dates in 1999? 22 A Correct. 23 Q March 24th? 24 A Wow and all the dates in 1999? 25 Delta lake about those records as far as medical leave? 26 A Correct. 27 Q Hold on a second. Oid you say 40 hours? 28 A Yes. 29 C Hold on a second. Oid you say 40 hours? 30 A Yesh, total. I'm going to give you five dates and a total of eight hours? 31 A I know that they call Dearma at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious amonth or whatever. 30 A Hold on a second. Oid you say 40 hours? 31 A Yesh. 32 C A Correct. 33 A Referrancy in the first proper or and tell them I'm g				Α	• •
8 Å Yes. 9 And I believe a lot of those records are written in hand or by hand, is that correct? 11 A I think all of them are. 12 Q And are those records records that you have prepared? 13 A Correct. 14 A Correct. 15 Q Now, left salk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. 16 Q Now, left salk about years. What about the year 1999? 17 A Yes. 18 A February 15th four hours; February 16th eight hours. 19 A Before January 4th? 20 Q Left's talk about years. What about the year 1999? 21 A February 15th four hours; February 16th eight hours. 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 26 A Correct. 27 Q Hold on a second. Did you say 40 hours? 28 A Yes. 29 Q Hold on a second. Did you say 40 hours? 29 A Correct. 20 Q And then what would be the next step? 20 A Correct. 21 Q The same thing for March 23rd? 22 Q Yes. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 Q And then what esse? What would help you record those hours, before the employee takes the time or when she returns? Whars your practice? 26 A Teser defined in the ween chaday. 27 I record them each day. 28 I record them each day. 29 Okay. 20 Okay. 21 A So if Marilyn would not have been there on the 22nd, I would have added the 22nd a so on. Dulwdh the in, I would have added the 23rd and so on. Dulwdh the in, I would have held the so if Marilyn nould have added the 23rd and so on. Dulwdh the in, I would have added the 23rd and so on. Dulwdh the in, I would have held the so if Marilyn would not have been there on the 22nd, I would have added the 23rd and so on. Dulwdh the in, I would the in it would have added the 23rd and so on. Dulwdh the in, I would the in this would have added t			7		
Q And I believe a lot of those records are written in hand or by hand; is that correct? A I think all of them are. A I think all of them are. A I think all of them are. A I think all of them are. A Correct. A Correct. A Correct. A I think all of them are. A Correct. A I think all of them are. A Correct. A I think all of them are. A I think all of them are. A Correct. A I think all of them are. A So if Marilyn would not have been there on the 22nd, I would have added the 23rd and soon. Unless she called in prior to that time and said I'm sick, I wouldn't be in, I won't be in this week or whatever. A Pobruary 15th four hours; February 16th eight hours. A February 15th four hours; February 16th eight hours. A February 25th six hours, February 26th eight hours. A February 25th six hours, February 26th eight hours. A February 25th six hours, February 26th eight hours. A February 25th six hours, February 26th eight hours. A February 25th six hours, February 26th eight hours. A February 25th six hours, 40 hours during March 12nd - eight hours. A February 25th six hours, 40 hours during March 12nd - eight hours. A February 25th six hours, 40 hours during March 12nd - eight hours, 40 hours during March 12nd - eight hours. A February 25th six hours, 40 hours during March 12nd - eight hours, 40 hours during March 12nd - eight hours. A February 25th six hours, 40 hours during March 12nd - eight hours, 40 hours during March 12nd - eight hours, 40 hours during March 12			Ŕ	-	
hand or by hand; is that correct? 1 A 1 think all of them are. 2 Q And are those records records that you have prepared? 3 A Correct. 4 A Correct. 5 Q Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave? 9 A Before January 4th? 9 Q Let's talk about tyears. What about the year 1999? 1 A You want all the dates in 1999? 2 Q Yes. 3 A February 15th four hours; February 16th eight hours. 4 MR. TOKUS: Counsel, can we identify what she's reading from? 9 MR. TOKUS: All right. 4 February 25th six hours, February 26th eight hours, March 18th and 19th each eight hours, 40 hours during March 22nd — Global on a second. Of 1999 we're still; right? 4 A Yea, Lotal. Tim going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 25th. 10 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 17 A Yes. 18 Q On March – taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 Q March 24th? 21 A Correct. 22 Q March 24th? 23 A Correct. 24 Li would have put the 22nd, I knould have added the 23rd and so on. Unless she called in prot to that time and said I'm sick, I wouldn't be in, I won't be in this week or whatever. 20 Do you have a recollection with respect to these five days, March 22nd through the 26th, whether Marily not call me directly. 24 When staff assistants would call sick, what would be the next septoners and tell the normal procedure? Who would they call? 25 MR. TOKUS: All right. 26 Li Would have put the 22nd, I knould have added the 23rd and so on. Unless she called in prot to that time and said I'm sick, I would nive put the 22nd, I would nive put the 23nd, I would nive put the 23nd, I would nive put the 23nd, I would nive put on the 23nd, I would nive put the 23nd, I would nive put the 23nd, I would nive put the 23nd, I would nive put the 23nd, I would nive put the 23nd, I would nive put the 23nd, I would n					
11 A I think all of them are. 22 Q And are those records records that you have 33 perpared? 44 A Correct. 55 Q Now, let's talk about those records as far as 56 medical leave. Do you know prior to January 4th 67 when was the last time that Marilyn requested any 68 medical leave? 69 Q Let's talk about years. What about the year 1999? 70 Q Let's talk about years. What about the year 1999? 71 A You want all the dates in 1999? 72 Q Yes. 73 A February 15th four hours; February 16th eight hours. 74 MR. TOKUS: Counsel, can we 75 identify what she's reading from? 76 g 77 MR. ARELLANO: She's reading 78 Exhibit No. 7. 79 Q Hold on a second. Did you say 40 hours? 70 A Yes. 71 A Yes. 72 A Yes. 73 Q Hold on a second. Did you say 40 hours? 74 A Yes. 75 A Yes. 76 A Olh-huh, yes. 77 A Yes. 78 A Correct. 79 A Throoff of March of 1999? 70 A Correct. 70 A Correct. 71 A Yes. 71 A Yes. 72 Correct. 71 A Correct. 71 A Yes. 72 Correct. 73 Correct. 74 A Correct. 75 Q March 24th? 75 A Correct. 76 Correct. 77 A Correct. 78 A Correct. 79 Q March 24th? 70 Q March 24th? 71 A Correct. 71 A Correct. 71 A Correct. 72 Q March 24th? 73 A February 25th six hours, February 16th eight hours, and the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. 70 Q Hold on a second. Did you say 40 hours? 71 A Yes. 72 A Yes. 73 Correct. 74 A Correct. 75 Q March 24th? 76 A Correct. 76 A Correct. 77 A Correct. 78 A Correct. 79 Q March 24th? 70 Q March 24th? 71 A Correct. 70 Q March 24th? 71 A Correct. 71 A Correct. 72 A Correct. 73 A Correct. 74 A Correct. 75 A Correct. 76 A Correct. 77 A Correct. 78 A Correct. 79 Q March 24th? 70 Q March 24th? 71 A Correct. 70 A nathen thing for March 22nd? 71 A Correct. 71 A Correct. 72 A Correct. 73 A Correct. 74 A Correct. 75 A Correct. 76 A Correct. 77 A Correct. 78 A Correct. 79 Q March 24th? 70 A Correct. 70 A nathen thing for March 22nd? 7		•		V	
12 Q And are those records records that you have prepared? 13 prepared? 14 A Correct. 15 Q Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave? 18 A Before January 4th? 20 Q Let's talk about years. What about the year 1999? 21 A You want all the dates in 1999? 22 Q Yes. 23 A February 15th four hours: February 16th eight hours. 24 War. TOKUS: Coursel, can we identify what she's reading from? 25 MR. RAELLANO: She's reading Exhibit No. 7. 26 MR. TOKUS: All right. 27 A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd — Q Hold on a second. Of 1999 we're still; right? 28 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 29 Q Hold on a second. Did you say 40 hours? 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 Q March 25th? 27 A Correct. 28 Q March 25th? 29 Q March 25th? 29 Q March 25th? 29 Q March 25th? 29 Q March 25th? 20 Q March 25th? 20 Q March 25th? 21 A I record them each day. 20 Q Oxay. 21 A Soi Marilyn would not have been there on the 22nd, 1 would have put the 22nd. If she would not have been there the 23rd, 1 would have put the 23rd, 1 would have added the 23rd and so on. Unless she called in prior to that time and said I'm sick, I wouldn't be in, I would think in the week or whatever. 20 Do you have a recollection with respect to these five days, March 22nd through the 26th, whether Marilyn and Early on directly. 21 A I know that they call Deanna at the front desk, the ten ormal procedure? Who would be the normal procedure? Who would be then I'm going to be off for a seek or two weeks or a month or whatever. 22 But given the number of years, is Deanna pretty mud the person that would be the next step? 23 A Correct. 24 Correct. 25 I the whether what the see there on the 22nd, I would thin		•			* *
prepared? A Correct. O Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Defermine the 18 medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave. Defermine the 23nd, I would have added the 23rd and so on. Unless he called in prior to that time and said I'm sick, I wouldn't be in, I won't be in this week or whatever. O Do you have a recollection with respect to these five days, March 22nd through the 26th, whether Marilyn called you directly? A February 15th four hours; February 16th eight hours, Mar. ToKUS: Counsel, can we identify what she's reading from? MR. ToKUS: Counsel, can we identify what she's reading from? MR. ToKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - O Hold on a second. Did you say 40 hours? A Yes. Hold on a second. Did you say 40 hours? A Yes. Hold on a second. Did you say 40 hours? A Yes. Hold on a second. Did you say 40 hours? A Yes. A Uh-huh, yes. A Yes. A Uh-huh, yes. A Yes. A On March - taking you step-by-step, March 22nd, she tok a total of eight hours? A Yes. A Yes. A Correct. C March 24th? A Correct. C March 25th? A Correct. C March 25th and marily nrequested any medical leve and time and so on. Unless ke called in prior to that time and said I'm sick, I would have at leed the 23rd and said I'm sick, I would hink if they were dead of the city of milwark would be the next step? A I know that they call Deanna at the front deak, the receptionist. I				Δ	· -
A Correct. A Correct. Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave? A Potronomy and the dates in 1999? A You want all the dates in 1999? A You want all the dates in 1999? A February 15th four hours; February 16th eight hours. MR. TOKUS: Counsel, can we identify what she's reading from? MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours, 40 hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd - eight hours during March 22nd been three on the 22nd, 2eight down die days, March 22nd through the eight hours die file days, March 22nd through the eight hours die file days, March 22nd through the 2ndt hours die file days, March 22nd		·			
15 Q Now, let's talk about those records as far as medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave? 16 A Before January 4th? 17 A Before January 4th? 18 A Before January 4th? 20 Q Let's talk about years. What about the year 1999? 21 A You want all the dates in 1999? 22 Q Yes. 23 A February 15th four hours; February 16th eight hours. 24 MR. TOKUS: Counsel, can we identify what she's reading from? 25 Exhibit No. 7. 26 MR. TOKUS: All right. 27 A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - 6 eight hours, 40 hours during March 22nd - 7 Q Hold on a second. Of 1999 we're still; right? 28 A Yes. 29 Q Hold on a second. Did you say 40 hours? 20 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 21 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 20 A Correct. 21 Q March 24th? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 March 25th? 27 Q March 25th? 28 Me did not call me directly. 29 De you have a recollection with respect to these five days, March 22nd thours week or whatever. 20 Do you have a recollection with respect to these five days, March 22nd through the 26th, whether Marilyn called you directly? 20 Do you have a recollection with respect to these five days, March 22nd through the 26th, whether Marilyn called you directly? 21 A I know that they call Dearna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell the nemal many of for a serious illness, they would speak to their superior and tell the nemal many of for a serious illness, they would speak to their superior and tell the nemal many of for a serious illness, they would speak to their superior and tell the nemal many of for a serious illness, t					
medical leave. Do you know prior to January 4th when was the last time that Marilyn requested any medical leave? A Before January 4th? Q Let's talk about years. What about the year 1999? A February 15th four hours; February 16th eight hours. MR. TOKUS: Counsel, can we identify what she's reading from? MR. TOKUS: Counsel, can we identify what she's reading from? MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd Q Hold on a second. Of 1999 we're still; right? A Yes. Q Hold on a second. Did you say 40 hours? A Yesh, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. Q That's for March of 1999? A Yes. Q That's for March of 1999? A Yes. Q That's for March of 1999? A Yes. Q That's for March 22nd, 23rd, 24th, 25th, 26th. Q That's for March of 1999? A Yes. Q That's for March of 1999? A Yes. Q That's for March 22nd, 23rd, 24th, 25th, 26th. Q That's for March of 1999? A Yes. Q That's for March 22nd, 28rd, 24th, 25th, 26th. Q That's for March of 1999? A Yes. Q That's for March 22nd, 28rd, 24th, 25th, 26th. Q That's for March of 1999? A Correct. Q March 24th? A Correct. A Before January 4th? A Correct. A February 25th six hours, February 26th eight hours, a Hardward 1999; A February 25th six hours, February 26th eight hours, a Hardward 1990; A February 25th six hours, February 26th eight hours, a Hardward 1990; A February 25th six hours, February 26th eight hours, a Hardward 1990; A February 25th six hours, February 26th eight hours, a Hardward 1990; A February 25th six hours, February 26th eight hours, a Hardward 1990; A February 25th six hours, February 26th eight hours, a Hardward 1990; B Wardward 1990; B W				А	
when was the last time that Marilyn requested any medical leave? A Before January 4th? Q Let's talk about years. What about the year 1999? A You want all the dates in 1999? MR. TOKUS: Counsel, can we identify what she's reading from? MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd			1		•
18 medical leave? 19 A Before January 4th? 20 Q Let's talk about years. What about the year 1999? 21 A You want all the dates in 1999? 22 Q Yes. 23 A February 15th four hours; February 16th eight hours. 24 MR. TOKUS: Counsel, can we identify what she's reading from? 25 MR. ARELLANO: She's reading from? 26 Exhibit No. 7. 27 MR. TOKUS: All right. 28 A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd		medical leave. Do you know prior to January 4th	1		
19 A Before January 4th? 20 Q Let's talk about years. What about the year 1999? 21 A You want all the dates in 1999? 22 Q Yes. 23 A February 15th four hours; February 16th eight hours. 24 MR. TOKUS: Counsel, can we identify what she's reading from? 25 MR. ARELLANO: She's reading 26 Exhibit No. 7. 27 MR. TOKUS: All right. 28 A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd			ł .		
Q Let's talk about years. What about the year 1999? A You want all the dates in 1999? Yes. Q Let's talk about years. What about the year 1999? A You want all the dates in 1999? A You want all the dates in 1999? A February 15th four hours; February 16th eight hours. MR. TOKUS: Counsel, can we identify what she's reading from? Backbist No. 7. MR. ARELLANO: She's reading Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd					
A You want all the dates in 1999? Q Yes. A February 15th four hours; February 16th eight hours. MR. TOKUS: Counsel, can we identify what she's reading from? MR. ARELLANO: She's reading Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd Q Hold on a second. Of 1999 we're still; right? A Yes. Q And just so I understand, because I never worked for the City of Milwaukee; okay? The Shame thing for March 23rd? A Correct. Q March 24th? A Correct. Q March 25th? A February 15th four hours; February 16th eight hours, 985 A February 15th four hours, 16th eight hours, 995 A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty much the person that would get the Q And then what would be the next step? A Uh-huh, yes. Q And just so I understand, because I never worked for the City of Milwaukee; okay? A Yes. Q On March taking you step-by-step, March 22nd, she took a total of eight hours? A Correct. Q The same thing for March 23rd? A Correct. Q March 24th? A Correct. Q March 24th? A Correct. Q March 25th? A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q And then what would send an email to the chief of staff that so and so called and they won't be in, they're sick. Q And then what else? What would be the next step? A And the				^	
22 Q Yes. 23 A February 15th four hours; February 16th eight hours. 24 MR. TOKUS: Counsel, can we identify what she's reading from? 25 MR. ARELLANO: She's reading Exhibit No. 7. 26 MR. TOKUS: All right. 27 A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd				Q	· · · · · · · · · · · · · · · · · · ·
A February 15th four hours; February 16th eight hours. MR. TOKUS: Counsel, can we identify what she's reading from? 93 MR. ARELLANO: She's reading Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd					,
24 MR. TOKUS: Counsel, can we identify what she's reading from? 25 MR. ARELLANO: She's reading 26 Exhibit No. 7. 27 MR. TOKUS: All right. 28 A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - 29 Q Hold on a second. Of 1999 we're still; right? 20 A Yes. 21 Q Hold on a second. Did you say 40 hours? 22 A Correct. 23 Q March 25th? 24 Q When staff assistants would call sick, what would be the normal procedure? Who would they call? 25 B When staff assistants would call sick, what would be the normal procedure? Who would they call? 26 When staff assistants would call sick, what would be the normal procedure? Who would shey call? 26 When staff assistants would call sick, what would be the normal procedure? Who would be the normal procedure? Who would here call? 26 When staff assistants would call sick, what would be the normal procedure? Who would be the normal procedure? Who would here call? 27 A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. 28 A Yes. 29 Q Hold on a second. Did you say 40 hours? 30 A Yes. 31 A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. 29 Q Hold on a second. Did you say 40 hours? 30 A Yes. 31 A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. 20 A Yes. 31 A I know that they call Peanna at the front desk, the receptionist. I would be the no					•
identify what she's reading from? MR. ARELLANO: She's reading Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd Q Hold on a second. Of 1999 we're still; right? A Yes. Q Hold on a second. Did you say 40 hours? A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. Q That's for March of 1999? A Uh-huh, yes. Q And just so I understand, because I never worked for the City of Milwaukee; okay? A Yes. Q On March taking you step-by-step, March 22nd, she took a total of eight hours? A Correct. Q March 24th? A Correct. Q March 25th? MR. ARELLANO: She's reading Exhibit No. 7. A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty mucl the person that would get the A She would get the initial call from them. Q And then what would be the next step? A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. Q And then what else? What would be the next step? A A dothen I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. Q Do you have any other records that would help you recall or recollect? A Correct. Q March 24th? A Correct. Q March 25th?					
93 MR. ARELLANO: She's reading Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd Q Hold on a second. Of 1999 we're still; right? A Yes. Q Hold on a second. Did you say 40 hours? A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. Q That's for March of 1999? A Uh-huh, yes. Q On March 94 Nesses I understand, because I never worked for the City of Milwaukee; okay? A Yes. Q On March taking you step-by-step, March 22nd, she took a total of eight hours? A Correct. Q March 24th? A Correct. Q March 25th? A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty much the person that would get the — S She would get the initial call from them. Q And then what would be the next step? A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. Q And then what else? What would be the next step? A Add then I take these slips from the receptionist on a day-to-day basis and record in my				Q	
MR. ARELLANO: She's reading Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd - Q Hold on a second. Of 1999 we're still; right? A Yes. Q Hold on a second. Did you say 40 hours? A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, Q That's for March of 1999? A Uh-huh, yes. Q And just so I understand, because I never worked for the City of Milwaukee; okay? A Yes. Q On March taking you step-by-step, March 22nd, she took a total of eight hours? A Correct. Q March 24th? A Correct. Q March 25th? A February 25th six hours, February 26th eight hours, MR. TOKUS: All right. A I know that they call Deanna at the front desk, the receptionist. I would think if they were going to be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much the person that would get the Q But given the number of years, is Deanna pretty much then I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty much then I'm going to be off for a week or two weeks or a month or whatever. Q But given the number of years, is Deanna pretty much then I'm going to be off for a week or two weeks or a month or whatever. Q And then what	25		25		
Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd O Hold on a second. Of 1999 we're still; right? A Yes. O Hold on a second. Did you say 40 hours? O Hold on a second. Did you say 40 hours? O Hold on a second. Did you say 40 hours? O Hold on a second. Did you say 40 hours? O Hold on a second. Did you say 40 hours? O Hold on a second. Did you say 40 hours? O Hold on a second bid her hen this person that would be the next step? A Hold		93			95
Exhibit No. 7. MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd Hold on a second. Of 1999 we're still; right? A Yes. O Hold on a second. Did you say 40 hours? O Hold on a second. Did you say 40 hours? A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. O That's for March of 1999? A Uh-huh, yes. O And just so I understand, because I never worked for the City of Milwaukee; okay? A Yes. O On March taking you step-by-step, March 22nd, she took a total of eight hours? A Correct. O March 23rd? A Correct. O March 25th? Exhibit No. 7. Reproval 25th six hours, February 26th eight hours, be gone longer than one day or for a serious illness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. O But given the number of years, is Deanna pretty much the person that would get the A She would get the initial call from them. O And then what would be the next step? A Held on a second. Did you say 40 hours? O And then what would be the next step? A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. O March 24th? A Correct. O March 25th? A I they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. C And then what else? What would be the next step? A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. O by ou have any other records that w	1	MR. ARELLANO: She's reading	1	Α	I know that they call Deanna at the front desk, the
MR. TOKUS: All right. A February 25th six hours, February 26th eight hours, March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd Q Hold on a second. Of 1999 we're still; right? A Yes. Q Hold on a second. Did you say 40 hours? A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. Q That's for March of 1999? A Uh-huh, yes. C And just so I understand, because I never worked for the City of Milwaukee; okay? A Yes. Q On March taking you step-by-step, March 22nd, she took a total of eight hours? A Correct. C The Same thing for March 23rd? A Correct. C March 25th? A Correct. C March 25th? A February 25th six hours, February 26th eight hours, all 19th each eight hours, and 19th each eight hours, and 19th each eight hours, and 19th each eight hours, defined in them I'm going to be off for a week or two weeks or a month or whatever. A She would get the 9 A She would get the initial call from them. 10 Q And then what would be the next step? A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. C Q And then what else? What would be the next step? A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. Q Do you have any other records that would help you recall or recollect? A Correct. A In addition to these here? There's the actual pay time card sheets.	2	•	2		receptionist. I would think if they were going to
4 February 25th six hours, February 26th eight hours, 5 March 17th three hours, March 18th and 19th each 6 eight hours, 40 hours during March 22nd 7 Q Hold on a second. Of 1999 we're still; right? 8 A Yes. 9 Q Hold on a second. Did you say 40 hours? 10 A Yeah, total. I'm going to give you five dates and a 11 total of 40 hours: March 22nd, 23rd, 24th, 25th, 12 26th. 13 Q That's for March of 1999? 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for 16 the City of Milwaukee; okay? 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she 19 took a total of eight hours? 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 4 Iilness, they would speak to their superior and tell them I'm going to be off for a week or two weeks or a month or whatever. 7 Q But given the number of years, is Deanna pretty much the person that would get the 9 A She would get the initial call from them. 10 Q And then what would be the next step? 11 A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 16 Q And then what else? What would be the next step? 17 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. Q Do you have any other records that would help you recall or recollect? A Correct. 24 A Correct. 25 Q March 25th? 26 March 25th?		MR. TOKUS: All right.	3		be gone longer than one day or for a serious
5 March 17th three hours, March 18th and 19th each eight hours, 40 hours during March 22nd 7 Q Hold on a second. Of 1999 we're still; right? 8 A Yes. 9 Q Hold on a second. Did you say 40 hours? 10 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 11 Q That's for March of 1999? 12 A Uh-huh, yes. 13 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 14 A Uh-huh, yes. 15 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 16 Q The same thing for March 23rd? 17 A Correct. 18 Q March 24th? 29 A them I'm going to be off for a week or two weeks or a month or whatever. 7 Q But given the number of years, is Deanna pretty much the person that would get the 9 A She would get the initial call from them. 10 Q And then what would be the next step? 11 A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 16 Q And then what else? What would be the next step? 17 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 20 Do you have any other records that would help you recall or recollect? 21 A Correct. 22 Q March 24th? 23 In addition to these here? There's the actual pay time card sheets.		A February 25th six hours, February 26th eight hours,	4		illness, they would speak to their superior and tell
eight hours, 40 hours during March 22nd 7 Q Hold on a second. Of 1999 we're still; right? 8 A Yes. 9 Q Hold on a second. Did you say 40 hours? 10 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 11 Zeth. 12 Would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 11 A Yes. 12 Q And then what would be the next step? 13 She would get the initial call from them. 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 16 A Yes. 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 But given the number of years, is Deanna pretty mucl the person that would get the 7 Q But given the number of years, is Deanna pretty mucl the person that would get the 8 She would get the initial call from them. 10 Q And then what would be the next step? 11 A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 15 Q And then what else? What would be the next step? 16 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 26 Do you have any other records that would help you recall or recollect? 27 A In addition to these here? There's the actual pay time card sheets.			5		them I'm going to be off for a week or two weeks or
7 Q Hold on a second. Of 1999 we're still; right? 8 A Yes. 9 Q Hold on a second. Did you say 40 hours? 10 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 11 Zeth. 12 Yes. 13 Q That's for March of 1999? 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 16 A Yes. 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 And march 23rd? 21 C The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 27 Q But given the number of years, is Deanna pretty much the person that would get the 8 A She would get the initial call from them. Q And then what would be the next step? A She would just record it on a little slip she had, and she probably would send an email to the chief of she would just record it on a little slip she had, and she probably would send an email to the chief of she would just record it on a little slip she had, and she probably would send an email to the chief of she would just record it on a little slip she had, and she probably would send an email to the chief of she would just record it on a little slip she had, and she probably would send an email to the chief of she would just record it on a little slip she had, and she probably would send an email to the chief of she would help you they're sick. Q And then what else? What would be the next step? A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. Q Do you have any other records that would help you recall or recollect? A In addition to these here? There's the actual pay time card sheets.	1	eight hours, 40 hours during March 22nd	6		a month or whatever.
8 A Yes. 9 Q Hold on a second. Did you say 40 hours? 10 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 11 A Uh-huh, yes. 12 A Yes. 13 Q That's for March of 1999? 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 16 A Yes. 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 3 She would get the initial call from them. 4 She would get the initial call from them. 10 Q And then what would be the next step? 11 A She would get the initial call from them. 10 Q And then what would be the next step? 11 A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 11 Q And then what else? What would be the next step? 12 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 22 Q Do you have any other records that would help you recall or recollect? 23 Q March 25th? 24 A In addition to these here? There's the actual pay time card sheets.			7	Q	But given the number of years, is Deanna pretty much
9 Hold on a second. Did you say 40 hours? 10 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 11 Zoth. 12 Yeah. Uh-huh, yes. 13 Q That's for March of 1999? 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 16 A Yes. 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 A Yeah, total. I'm going to give you five dates and a total of eight hours? 29 A She would get the initial call from them. 10 Q And then what would be the next step? 11 A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 10 Q And then what else? What would be the next step? 11 A If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 11 Q And then what else? What would be the next step? 12 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 19 Q Do you have any other records that would help you recall or recollect? 20 A In addition to these here? There's the actual pay time card sheets.	1	· ·	8		the person that would get the
10 A Yeah, total. I'm going to give you five dates and a total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 12 26th. 13 Q That's for March of 1999? 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 16 A Yes. 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 C A Correct. 20 The same thing for March 23rd? 21 Q March 24th? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26th. 16 If they were just going to be off that day, she would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 16 Q And then what else? What would be the next step? 17 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 26 Q Do you have any other records that would help you recall or recollect? 27 A In addition to these here? There's the actual pay time card sheets.	1		9	Α	She would get the initial call from them.
total of 40 hours: March 22nd, 23rd, 24th, 25th, 26th. 12	1		10		
12 26th. 13 Q That's for March of 1999? 14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 16 the City of Milwaukee; okay? 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 took a total of eight hours? 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 would just record it on a little slip she had, and she probably would send an email to the chief of staff that so and so called and they won't be in, they're sick. 16 Q And then what else? What would be the next step? 17 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 22 Q Do you have any other records that would help you recall or recollect? 23 Q March 25th? 24 A In addition to these here? There's the actual pay time card sheets.	1		11	À	If they were just going to be off that day, she
13			12		
14 A Uh-huh, yes. 15 Q And just so I understand, because I never worked for 16 the City of Milwaukee; okay? 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she 19 took a total of eight hours? 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 And then what else? What would be the next step? 17 A And then I take these slips from the receptionist on 18 a day-to-day basis and record in my book, if she 19 doesn't call me or email me personally and tell me 20 this person called in. Sometimes she forgets. But 21 I check them as I'm doing time cards. 22 Q Do you have any other records that would help you 23 recall or recollect? 24 A In addition to these here? There's the actual pay 25 time card sheets.			13		
15 Q And just so I understand, because I never worked for the City of Milwaukee; okay? 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 15 they're sick. Q And then what else? What would be the next step? A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 22 Q Do you have any other records that would help you recall or recollect? 23 In addition to these here? There's the actual pay time card sheets.		•			<u> </u>
the City of Milwaukee; okay? 17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 A Yes. 27 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 26 Q Do you have any other records that would help you recall or recollect? 27 A In addition to these here? There's the actual pay time card sheets.	1				•
17 A Yes. 18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 19 A Correct. 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 A And then I take these slips from the receptionist on a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 26 Q Do you have any other records that would help you recall or recollect? 27 A In addition to these here? There's the actual pay time card sheets.			1	O	•
18 Q On March taking you step-by-step, March 22nd, she took a total of eight hours? 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 18 a day-to-day basis and record in my book, if she doesn't call me or email me personally and tell me this person called in. Sometimes she forgets. But I check them as I'm doing time cards. 22 Q Do you have any other records that would help you recall or recollect? 24 A In addition to these here? There's the actual pay time card sheets.	1				
took a total of eight hours? 19 doesn't call me or email me personally and tell me 20 A Correct. 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 doesn't call me or email me personally and tell me 27 this person called in. Sometimes she forgets. But 28 Use the mas I'm doing time cards. 29 Q Do you have any other records that would help you recall or recollect? 20 The same thing for March 23rd? 21 I check them as I'm doing time cards. 22 Q Do you have any other records that would help you recall or recollect? 23 In addition to these here? There's the actual pay time card sheets.				, ,	
20 this person called in. Sometimes she forgets. But 21 Q The same thing for March 23rd? 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 20 this person called in. Sometimes she forgets. But 21 I check them as I'm doing time cards. 22 Q Do you have any other records that would help you 23 recall or recollect? 24 A In addition to these here? There's the actual pay 25 time card sheets.	1	· · · · · · · · · · · · · · · · · · ·			
21 I check them as I'm doing time cards. 22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 I check them as I'm doing time cards. 27 Q Do you have any other records that would help you recall or recollect? 28 A In addition to these here? There's the actual pay time card sheets.		<u> </u>			
22 A Correct. 23 Q March 24th? 24 A Correct. 25 Q March 25th? 26 Do you have any other records that would help you recall or recollect? 26 A In addition to these here? There's the actual pay time card sheets.	,				•
23 Q March 24th? 24 A Correct. 25 Q March 25th? 28 recall or recollect? 29 A In addition to these here? There's the actual pay time card sheets.	1			\mathcal{C}	
24 A Correct. 25 Q March 25th? 26 A In addition to these here? There's the actual pay time card sheets.	1			~	
25 Q March 25th? 25 time card sheets.	1	· ·	1	٨	
	t		1	Α.	
34	125		25		
		J4	<u> </u>		and and an article and article article and article article and article art

			Compress Deposition of PATRICIA			TAVVICKI 3/14/02 Offeet 20
Г	1	Ā	It was either Mr. Soika or Rowen; I'm not sure.	1	Α	She did not give me one. I don't know if she gave
1	2	Q	Let's go back to what other sick leave is requested	2		it to someone else.
	3		for Marilyn Figueroa.	3		What about March 22nd through March 26th?
	4	Α	In 1999?	4		I do not have it.
	5	Q	In 1999. We covered March 22nd through the 26th?	5	Q	What about February 15th
	6		Okay. June 30th eight hours. And each of the dates	6		No.
1	7		that I'm going to give you is for eight hours.	7	Q	through the 26th? What about March 17th through
	8	Q	Okay.	8		the 19th?
1	9		July 1st, 2nd, 6th, 7th, 8, 9, July 19th,	9		No.
	10		September 27th.	10	Q	Do you recall whether or not during the year of 1999
1	11	0	Hold on. You're going too fast. September 27th?	11		whenever she took over three years of sick leave
	12		Right. October 7th, October 8th. And it looks	12		Three days.
	13		like I can't read but I'm sure it's December 15,	13	Q	Three days, excuse me. Do you recall whether or not
	14		16 and 17 a total of 18 hours, those three days.	14		you contacted the employment relations office to
	15	0	That is again December of 1999?	15		process sick leave?
	16		Yes.	16	Α	No, I did not.
	17		Let's go back to July 1 through the 9th.	17		Is there a reason why you didn't?
	18	-	Right.	18	À	Because she wasn't on FMLA. The only time I have to
	19		Just to make sure that I understand what you're	19		contact them is if she's going on FMLA.
	20	•	telling me.	20	Q	Do you recall whether or not you demanded that she
	21	Α	Okay.	21		produce a medical authorization?
	22		What I believe you are telling me is that on	22		I did not.
	23	`	July 1st, 2nd, 6, 7, 8 and 9 Marilyn Figueroa took	23	Q	According to the practice and policy of the office,
	24		eight hours per day?	24		was she required to produce one after three days?
	25	Α	Correct.	25	Α	I would say no because it had been the practice, no
			101	ļ		103
T	1	0	For a consecutive 40 hours that week of sick leave?	1		one ever gave me a doctor's excuse.
				i	C	
	2	Α	Well, actually June 30th she took eight hours also.	2	Q	And all of the years that you have been working for
	2	A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave?	i	Q	
	2 3 4	A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes.	2	Q	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that
	2 3 4 5	A Q A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct?	2 3 4	Q	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce
	2 3 4	A Q A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah.	2 3 4 5	Q	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa
	2 3 4 5 6 7	A Q A Q A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive?	2 3 4 5	Q	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th?
	2 3 4 5 6 7 8	AQAQAQA	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes.	2 3 4 5 6 7		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of
	2 3 4 5 6 7 8 9	AQAQAQAQ	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct?	2 3 4 5 6 7 8		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question.
- 1	2 3 4 5 6 7 8	AQAQAQAQ	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in	2 3 4 5 6 7 8 9 10	Ç	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. MR. TOKUS: It's not the state of the record.
	2 3 4 5 6 7 8 9	AQAQAQAQ	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in	2 3 4 5 6 7 8 9 10 11 12	Ç	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on
	2 3 4 5 6 7 8 9 10	AQAQAQAQ	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't	2 3 4 5 6 7 8 9 10 11 12 13	Ç	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between
	2 3 4 5 6 7 8 9 10 11	AQAQAQAQ	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the	2 3 4 5 6 7 8 9 10 11 12 13	Ç	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA.
	2 3 4 5 6 7 8 9 10 11 12 13	AQAQAQA	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in	2 3 4 5 6 7 8 9 10 11 12 13 14 15	() A	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this.
	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	() A	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	() A	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	() A	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	() A	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	() () ()	And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from any of the records that you have whether or not she	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice. But I guess I did.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from any of the records that you have whether or not she provided a medical leave authorization for July 1st	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice. But I guess I did. And was that still the practice that if an employee
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from any of the records that you have whether or not she	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice. But I guess I did. And was that still the practice that if an employee takes more than three days, regardless of whether
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from any of the records that you have whether or not she provided a medical leave authorization for July 1st	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice. But I guess I did. And was that still the practice that if an employee takes more than three days, regardless of whether they are going into family leave or not, as I
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from any of the records that you have whether or not she provided a medical leave authorization for July 1st through actually June 30th through July 9th? No. What about, you don't know or she never did?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice. But I guess I did. And was that still the practice that if an employee takes more than three days, regardless of whether they are going into family leave or not, as I understand the practice is that if they take more
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A Q A Q	Well, actually June 30th she took eight hours also. So we're talking about seven days of sick leave? Yes. Is that correct? Yeah. Consecutive? Yes. Is that correct? Well, I the Fourth of July, the 5th of July isn't in there. The Fourth and 5th of July aren't in there. It goes from the 1st, the 2nd, the 6th, the 7th, the 8th and the 9th. So 4 and 5 is not in there. And again, do you see anything in your notes No that may help you to tell me what type of illness she was taking? No, no. All right, very good. Are you able to tell me from any of the records that you have whether or not she provided a medical leave authorization for July 1st through actually June 30th through July 9th?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		And all of the years that you have been working for Mayor Norquist, is it fair and accurate to say that the first time that someone was required to produce a medical authorization was when Marilyn Figueroa left on January 4th? MR. TOKUS: Objected to the form of the question. Go ahead. MR. TOKUS: It's not the state of the record. She was asked to provide it because she was going on family leave, FMLA. There's a difference between just sick leave and FMLA. Well, let me see if I understand this. Okay. I thought you testified under oath that anyone that takes more than three days is required to provide a medical authorization according to the policy and practice. But I guess I did. And was that still the practice that if an employee takes more than three days, regardless of whether they are going into family leave or not, as I

Deposition of PATRICIA A. STAWICKI 3/14/02

- terminated I believe February of the year 2000, did 2 you discuss with the Mayor anything related to
 - Marilyn Figueroa?
- A I never discussed anything with the Mayor at all. 4
- Q Did Mr. Soika disclose any information regarding 5 Marilyn Figueroa to you with respect to anything 6 7 other than the family medical leave?
- 8 A No, not that I remember.
- 9 O All right. Let me show you what has been marked as 10 Exhibit No. 8, and I may be out of sequence. Have
- 11 you ever seen this document before?
- 12 A Yes.

3

- 13 O And do you recognize when you saw this document for
- 14 the first time? A This looks like a document that I probably typed 15
- after I had talked to someone in DER regarding the 16 17 medical leave.
- 18 Q Who did you talk to at DER?
- A It doesn't say. It doesn't say and I don't 19
- 20 remember. It mentions Devon.
- 21 O Who is Devon?
- 22 A There is a Devon Brown in DER, but I can't say
- 23 whether she was the person I spoke to regarding 24
- 25 Q Did you prepare that document before you spoke to

- exactly is it that you were attempting to address?
- 2 A Do I notify employee benefits? I would say -- can I 3 read the statement first?
- 4 O If any part of that statement helps you to place 5 that second question in proper context, please do 6
- 7 A Okay. I don't know what it means.
- 8 Q Now, let me get your attention for a second. After 9 you spoke to Mr. Hansen --
- 10
- Q -- regarding Marilyn Figueroa's medical leave and 11 12 some of the concerns you had after receiving a phone call from Ms. Pruitt did you say? 13
- A Pettigrew. 14
- 15 Q Pettigrew. Did you have any additional contact with 16 Mr. Hansen regarding Marilyn Figueroa?
- 17 A After I spoke to him the first time?
- 18 Q Right.
- 19 A I would say no, but I'm not positive.
- 20 Q After you spoke to Mr. Hansen when he told you that 21 he would take care of it --
- 22 A Yes.
- 23 Q -- did you have any further contacts with employment
- 24 relations regarding Marilyn Figueroa?
- 25 A I don't think so.

111

- Mr. Hansen or after? 1
- 2 A I don't know. I would say before, but there's no
- 3
- 4 O And there are some notes at the bottom of that
- 5 record; is that correct?
- 6 A Uh-huh.
- 7 Q Is that yes?
- 8 A I wrote those.
- Q And can you read the very first note? 9
- A It says "do I submit a time card? 10
- 11 Q Who did you direct that question to?
- A 1 think it was to myself. That I needed an answer 12 13 of what I was supposed to do.
- O Well, what exactly did you understand you were 14 15 supposed to do?
- 16 A I don't know. That's why I have the note but --
- Q Did you ever receive a response to the first 17 18 question regarding the time cards?
- 19 A I don't know.

24

- O Can you read the second note? 20
- A It says "do I notify employee benefits?" 21
- 22 Q And who did you direct that question to?
- 23 A I think again it was to myself, but I'm not positive. It might have been just a notation.
- 25 O Put that last question in proper context. What

- O So to the best of your recollection, is it fair and 1 2 accurate to say that your contact with Mr. Hansen 3 was the last contact you remember having with 4 employment relations regarding Marilyn Figueroa?
- 5 A I think so.
- 6 Q Let me have that page. And it seems quite logical 7 because in this document which has been identified 8 as Exhibit No. 8 you wrote down the information you 9 obtained from employment relations; correct?
- 10 A That's what I would think it is.
- Q And then you wrote another paragraph at the bottom 11 12 regarding the communication --
- 13 A Right.
- 14 Q -- you received from Ms. Pettigrew; correct?
- 15 A Yes.
- 16 Q And it was this information that you related to 17 Mr. Hansen --
- 18 A Correct.
- 19 Q -- during your phone conference? Was that a phone 20 conference or was that in person?
- 21 A It was on the phone, yes.
 - MR. TOKUS: You'll have to let him

23 finish talking.

THE WITNESS: I'm sorry.

Q You're doing marvelous. Very well. And whatever he

112

22

24

		-	
1	relations?	1	affair with her I believe.
2	A Correct.	2	Q Back in January of the year 2000 did you know that
3	Q And keep one in the file; correct?	3	Marilyn Figueroa was hospitalized?
4	A Yes.	4	A I don't know.
5	Q And as you sit here under oath, is it your testimony	5	Q Did anybody mention it to you at the office,
1	And as you sit here under out, is it your testimony	6	including Mr. Soika?
6	that you have never known the fact that Marilyn's	1	A I don't know.
7	attorney gave a medical release to Anne Shindell,	7	
8	the Mayor's attorney?	8	Q Go ahead.
9	A I don't.	9	A What do you mean
10	Q All right, very good. Do you recall whether or not	10	MR. TOKUS: You finished, you
11	Mr. Soika ever directed you to send Marilyn Figueroa	11	finished your answer.
12	any type of information about the benefits the City	12	THE WITNESS: Okay.
	provided to her, other than the termination letter?	13	MR. TOKUS: If he wants something
13		14	from you, he'll ask you again.
14	A I don't believe so.	15	THE WITNESS: Okay.
15	Q Okay, very good. Very good. Now, just so I leave		MR. ARELLANO: You're intimidating
16	this Exhibit 8 alone, what prompted you to type this	16	· · · · · · · · · · · · · · · · · · ·
17	particular document, ma'am?	17	this very fine lady.
18	A Generally I type it so that there's proof that I did	18	Q J
19	something.	19	
20	Q There's a record?	20	
21	A Yes.	21	A
22	Q And is there a reason as to why you did not date	22	•
		23	Q
23	this communication?	24	
24	A No, no.	25	A
25	Q ls that your practice?	25	119
	117	1	110
1	• • • • • • • • • • • • • • • • • • • •		
1		1	
1 2	A To not date something? No. Generally I date it.		Q
2	A To not date something? No. Generally I date it. Q Did anybody instruct you not to date?	2	Q A
2 3	A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no.	2 3	Q A Q
2 3 4	A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important	2 3 4	Q A Q A
2 3 4 5	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? 	2 3 4 5	Q A Q A Q
2 3 4 5 6	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. 	2 3 4 5 6	Q A Q A
2 3 4 5 6 7	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that 	2 3 4 5 6 7	Q A Q A Q
2 3 4 5 6 7 8	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? 	2 3 4 5 6 7 8	Q A Q A
2 3 4 5 6 7	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. 	2 3 4 5 6 7 8 9	Q A Q A Q A
2 3 4 5 6 7 8	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? 	2 3 4 5 6 7 8 9	Q A Q A Q A Q A Q A Q A Q A Q A R Q A R R R R
2 3 4 5 6 7 8 9	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were 	2 3 4 5 6 7 8 9	Q A Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture.
2 3 4 5 6 7 8 9 10	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a 	2 3 4 5 6 7 8 9	Q A Q A Q A Q A Q A Q A Q A Q A R Q A R R R R
2 3 4 5 6 7 8 9 10 11	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as 	2 3 4 5 6 7 8 9 10	Q A Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture.
2 3 4 5 6 7 8 9 10 11 12 13	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? 	2 3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The
2 3 4 5 6 7 8 9 10 11 12 13 14	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. 	2 3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A Q A Q A Q A Q A I right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q A Q A Q A I right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A Q A Q A Q A Q A I right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes. Q "According to Marie Pettigrew, I can't do that until
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes. Q "According to Marie Pettigrew, I can't do that until I have received the request for medical leave from
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on that. I never thought of it. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A Q All right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes. Q "According to Marie Pettigrew, I can't do that until I have received the request for medical leave from Marilyn's doctor." Did I read that correctly?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A Q A Q A I right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes. Q "According to Marie Pettigrew, I can't do that until I have received the request for medical leave from Marilyn's doctor." Did I read that correctly? A Correct.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on that. I never thought of it. Q Did you ever learn that Marilyn Figueroa was 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on that. I never thought of it. Q Did you ever learn that Marilyn Figueroa was hospitalized before she was terminated? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A Q A Q A I right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes. Q "According to Marie Pettigrew, I can't do that until I have received the request for medical leave from Marilyn's doctor." Did I read that correctly? A Correct.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on that. I never thought of it. Q Did you ever learn that Marilyn Figueroa was hospitalized before she was terminated? A I don't know where this was, in what point of time, 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q All right. What did I have this paper up for? I don't know. I was taking a picture. I've got to talk to you for a second. Well, here. You take this. It's Exhibit No. 8. The bottom of Exhibit No. 8 you wrote as follows: "On January 27th I put Marilyn on unpaid FMLA leave." Did I read that correctly? A Yes. Q "According to Marie Pettigrew, I can't do that until I have received the request for medical leave from Marilyn's doctor." Did I read that correctly? A Correct. Q "I called Jeff Hansen and told him what Marie said. He said he will take care of it." Did I read that
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A To not date something? No. Generally I date it. Q Did anybody instruct you not to date? A No, no. Q Did you feel that dating this document was important given the nature of the situation? A No. I didn't even think the document was important. Q When was the first time that you learned that Marilyn was not coming back? A I don't know. Q Did you think during this period of time as you were trying to get the medical leave act, were you a little confused about what was going on as far as Marilyn Figueroa was concerned? A Not really. Q You knew at all times what was going on? A I knew nothing. Q Well, did you know did you believe Marilyn was ill? A Did I believe her? I didn't have any opinion on that. I never thought of it. Q Did you ever learn that Marilyn Figueroa was hospitalized before she was terminated? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q

		Deposition of Airrion			
1	Q	Did you think it was rather delicate the way this	1	•	Did she ever complain to you about depression,
2		thing needed to be handled?	2		anger, upset?
3	Α	I guess I didn't think anything about it.	3		She used to complain at times and I thought it was
4	Q	You mean to tell me that nothing in the handling of	4		due to the workload. She worked after hours.
5		this matter appeared unusual to you?	5	_	You assumed that it was because of the workload?
6	Α	Well, I think probably what I thought was why isn't	6	Α	Correct.
7		Marilyn sending in this medical.	7	Q	But did she ever tell you exactly what her
8	Q	That wasn't my question. My question is given the	8		complaints were?
9	`	scenario that was developing between Mr. Hansen,	9	Α	No.
10		Mr. Soika, did you have a feeling that this thing	-10	Q	Did you notice any type of sadness, depression in
11		was being handled in a rather unusual way?	11	•	Marilyn Figueroa?
12		MR. TOKUS: Objection to the word	12	Α	Marilyn to me always was kind of moody. I mean some
13		scenario.	13		days she would be very, very happy. Other days
14	Ο	Go ahead.	14		she'd be very sad.
15	•	I don't know.	15	O	Is that what you observed in 1999?
16		Before this Marilyn Figueroa exit from the job	16		I don't know when I observed this. I think from the
17	V	January of the year 2000, when was the last time in	17	• •	beginning when I knew Marilyn she was having
18		all of your years that you recall Mr. Hansen being	18		problems with her children. She used to tell me
19		directly involved in processing a family leave?	19		about her ex-husband. And I contributed all this to
20	Δ	I don't recall him	20		the things she was telling me.
21		As you were processing that family leave or	21	0	What did she tell you about her ex-husband?
22	Ų	attempting to, because you did attempt; correct?	22		That he was very difficult to get along with and she
23	Λ.		23	′`	was getting a divorce. She was in the midst of a
		Yes.	24		divorce.
24	-	You had nothing against Marilyn Figueroa, did you?	25	Ω	Anything else?
25	А	No. 125	23	Ų	127
			<u> </u>		
1	Q	Did there come a time when you learned during this	1	Α	At one time she told me that her children were in
2		(l.) Mr. Discourses and attenuation to file o			
		process that Ms. Figueroa was attempting to file a	2		Florida with her husband and she didn't know if she
3		discrimination complaint against the City?	3	_	would get them back.
3 4		discrimination complaint against the City? Did I know before this?	3 4	Q	would get them back. Did she ever tell you that her ex-husband was
3	Q	discrimination complaint against the City? Did I know before this? Correct.	3 4 5		would get them back. Did she ever tell you that her ex-husband was abusive to her?
3 4 5 6	Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact.	3 4	Α	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally.
3 4 5 6 7	Q A Q	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that	3 4 5 6 7	A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else?
3 4 5 6	Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have.	3 4 5 6 7 8	A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor.
3 4 5 6 7 8 9	Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated	3 4 5 6 7 8 9	A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear?
3 4 5 6 7 8 9	Q A Q A Q	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after?	3 4 5 6 7 8 9	A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to
3 4 5 6 7 8 9	Q A Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know.	3 4 5 6 7 8 9 10	A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her.
3 4 5 6 7 8 9	Q A Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after?	3 4 5 6 7 8 9 10 11	A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually
3 4 5 6 7 8 9 10	Q A Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know.	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee?
3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office.	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it.
3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's	3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that?
3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A Q A	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office.	3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor.
3 4 5 6 7 8 9 10 11 12 13 14 15	Q A Q A Q A Q	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear?
3 4 5 6 7 8 9 10 11 12 13 14 15 16	QAQAQ AQAQ AQAQ	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	QAQAQ AQ AQ	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	QAQAQ AQ AQA	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	QAQAQ AQ AQAQ	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew. That she was going to file some kind of complaint.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked. Do you remember the year when that occurred?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	QAQAQ AQ AQAQA	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew. That she was going to file some kind of complaint. Against whom? I don't know.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked. Do you remember the year when that occurred? No, I don't.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	QAQAQ AQ AQAQA	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew. That she was going to file some kind of complaint. Against whom?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked. Do you remember the year when that occurred? No, I don't. When you said that Marilyn was kind of moody, happy,
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQAQ AQ AQAQAQ	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew. That she was going to file some kind of complaint. Against whom? I don't know. Before Marilyn left did you ever sense a change in her demeanor, attitude?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked. Do you remember the year when that occurred? No, I don't. When you said that Marilyn was kind of moody, happy, sad
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	QAQAQ AQ AQAQAQ	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew. That she was going to file some kind of complaint. Against whom? I don't know. Before Marilyn left did you ever sense a change in	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked. Do you remember the year when that occurred? No, I don't. When you said that Marilyn was kind of moody, happy, sad Yes.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	QAQAQ AQ AQAQAQ	discrimination complaint against the City? Did I know before this? Correct. I don't think I knew for a fact. Did you hear rumors that I might have. When did you learn that, before she was terminated or after? I don't know. How did you learn some of those rumors? How did you hear of these rumors? Just by people talking in the office. What kind of rumors did you hear regarding Marilyn's intent to file a discrimination complaint? I don't remember exactly. Just tell me the gist of what you knew. That she was going to file some kind of complaint. Against whom? I don't know. Before Marilyn left did you ever sense a change in her demeanor, attitude? She seemed happy to me before she didn't report to	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	would get them back. Did she ever tell you that her ex-husband was abusive to her? She didn't tell me personally. Did she tell somebody else? I think I might have heard it through rumor. What did you hear? Just what you said, that her husband was abusive to her. Do you recall a time when Marilyn was sexually attacked in the streets of Milwaukee? I vaguely remember hearing something about it. How did you hear that? Through rumor. What did you hear? That she was attacked. Do you remember the year when that occurred? No, I don't. When you said that Marilyn was kind of moody, happy, sad Yes was that your recollection all the way until she

	Cas	E	Compress Deposition of PATRICIA		<u> </u>	
ſ	1	0	All right.	1		think.
1	2	`	(Discussion off the record)	2		What's Linda Huerta's position?
١	3	0	Other than observing those what you believe to be	3	Α	Administrative assistant 2, I believe.
	4	×	somewhat unusual displays of	4	Q	What are her duties?
	5	Δ	Well, I've never experienced anyone doing that in a	5	Α	She's a clerical person, so she types letters and
1	6	,,	business office before, so	6		things and clerical duties.
1	7	\circ	Other than that, do you have any reason to believe	7	0	But as far as assistants to the Mayor, Ms. Cubias
		Ų	that Marilyn was a promiscuous woman?	8	`	would be the only one; correct?
	8	٨	I've heard rumors.	9	Α	Correct, yes.
	9			10		And before her it was Marilyn; correct?
	10	Ý	What rumors did you hear?	11		I don't know whether she took Marilyn's position.
	11	А	I can't name any one person, but I've heard that she	12		That wasn't my question. My question is the
١	12	_	was that type of person, all through rumors.	13	Q	previous Hispanic assistant to the Mayor would have
	13	Q	When did you learn that?	14		been Marilyn Figueroa?
	14	Α	I don't know. I think if I had to pin down a date,	15		MR. TOKUS: Objection, that's not
	15		probably from the very beginning when she started	16		the state of the record.
	16		working there. But I'm not positive.		٨	I think so.
	17	Q	Did you get this information from a man or from a	17		Let's start with so Daisy Cubias would have said
ı	18		woman?	18	Ų	things to you after she came on board?
İ	19		A woman.	19	۸	
	20	Q	And is this a woman that is still working for the	20	А	No. I think it happened after this whole thing was
	21		Mayor's office?	21	^	out in the open.
١	22		Yes.	22		Right. After Marilyn Figueroa left the City?
1	23		Is that Ms. Wyttenbach?	23		I believe so.
ı	24		No.	24	-	What did Ms. Cubias say about Marilyn Figueroa?
	25	Q	Who is that? Go ahead.	25	А	I don't remember exactly.
			133			
)	1	Α	Linda Huerta.	1	Q	What is the gist of what you believe she was telling
	2		How long has she been working there?	2		you?
	3		About 10 years.	3		That Marilyn slept around.
	4		Any other person other than Linda Huerta?	4	Q	Did she mention names?
	5		I think Daisy Cubias.	5	Δ	x 1 (.1 1)
ļ	6		I Ullik Daisy Cubias.			I don't believe so.
		0	Anyone else other than Daisy Cubias?	6		Anything else
	7		Anyone else other than Daisy Cubias?	6 7	Q	
	7 8	Α	Anyone else other than Daisy Cubias? No.		Q A	Anything else
	8	Α	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors	7	Q A Q	Anything else No.
	8 9	A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior?	7 8	Q A Q A	Anything else No. 1 that she said to you?
	8 9 10	A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so.	7 8 9	Q A Q A	Anything else No that she said to you? No.
	8 9 10 11	A Q A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males?	7 8 9 10	Q A Q A	Anything else No that she said to you? No How did that conversation develop?
	8 9 10 11 12	A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No.	7 8 9 10 11	Q A Q A	Anything else No that she said to you? No. How did that conversation develop? Gossip in the office.
	8 9 10 11 12 13	A Q A Q A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias?	7 8 9 10 11 12	Q A Q A Q A	 Anything else No. that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present.
	8 9 10 11 12 13	A Q A Q A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last	7 8 9 10 11 12 13	Q A Q A Q A Q A Q A Q A Q A Q A Q A Q A	 Anything else No. that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me.
	8 9 10 11 12 13 14 15	A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year.	7 8 9 10 11 12 13 14	Q A Q A Q A Q A Q A Q A Q A Q A Q A Q A	Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else?
	8 9 10 11 12 13 14 15 16	A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa?	7 8 9 10 11 12 13 14 15	Q A Q A Q A Q A	Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical.
	8 9 10 11 12 13 14 15 16	A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of	7 8 9 10 11 12 13 14 15 16	Q A Q A Q A Q A Q A Q A Q A Q A Q A Q A	Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just
	8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of	7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q A Q A Q A Q A Q A Q A Q A	Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall.
	8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions.	7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q A Q A Q A Q A Q A Q A Q A	Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around
	8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions. She's an assistant to the Mayor; correct?	7 8 9 10 11 12 13 14 15 16 17 18 19 20		Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around I don't think she said it exactly like that.
	8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions. She's an assistant to the Mayor; correct? Actually she's staff assistant to the Mayor senior.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around I don't think she said it exactly like that. But that's what you understood
	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions. She's an assistant to the Mayor; correct? Actually she's staff assistant to the Mayor senior. And how many other Hispanic persons?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around I don't think she said it exactly like that. But that's what you understood It was meaning that's what I understood it to be.
Action	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions. She's an assistant to the Mayor; correct? Actually she's staff assistant to the Mayor senior. And how many other Hispanic persons? Are in the office?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around I don't think she said it exactly like that. But that's what you understood I twas meaning that's what I understood it to be. Did she mention names of men?
, of tenners	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions. She's an assistant to the Mayor; correct? Actually she's staff assistant to the Mayor senior. And how many other Hispanic persons? Are in the office? Yes.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around I don't think she said it exactly like that. But that's what you understood It was meaning that's what I understood it to be. Did she mention names of men? I don't believe so.
, plane, a	8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	Anyone else other than Daisy Cubias? No. Are these the only two people that shared rumors with you about Ms. Figueroa's behavior? I believe so. Any males? No. How long have you known Ms. Daisy Cubias? I believe she started with our office maybe last year. Isn't she the person that replaced Marilyn Figueroa? It's hard to say because there are six positions of staff assistant to the Mayor, and they're kind of intertwined, so we just fill positions. She's an assistant to the Mayor; correct? Actually she's staff assistant to the Mayor senior. And how many other Hispanic persons? Are in the office?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		Anything else No that she said to you? No. How did that conversation develop? Gossip in the office. How did that happen? Tell me who was present. I think probably Linda, Daisy, me. Anyone else? It might have been Patty Marshall. It was just clerical. Anyone else? Not that I can recall. And when she said that Marilyn slept around I don't think she said it exactly like that. But that's what you understood I twas meaning that's what I understood it to be. Did she mention names of men?

	ase Compress Deposition of PATRICI	<u> </u>		
1	Daisy Cubias; did you discuss that with anyone?	1		As far as I can recollect.
2	A No.	2	Q	And the document is signed by whom? Can you tell
3	Q Daisy Cubias was hired after Marilyn Figueroa was	3		me?
4	terminated?	4	Α	Robert L. Loiben, medical doctor.
5	A I believe she was.	5	0	All right. And it's dated what day?
6	Q Do you know who has been assigned to the tasks and	6	_	January 21st.
7	duties that Marilyn Figueroa was responsible for?	7		And who's the subject of that particular
	A I believe it's Steve Mahan. I think. I can't be	8	•	Marilyn Figueroa.
8		9		And what is the period of time that he's placing
9	positive.	10	~	Marilyn Figueroa on leave?
10	Q Are you familiar with the duties that	11	Δ	January 4th, 2000 until a date yet to be determined.
111	Marilyn Figueroa was responsible for?	12	-0	And again, is it your sworn testimony that no one
12		13	V	ever mentioned this record to you?
13	Q Is that what Steve Maham does now?	14	٨	I have never seen this.
14	A I think both Steve and Daisy might be doing that.	1		In addition to this record, what other records or
15		15	Ų	In addition to this fector, what other fectors of
16		16		forms Marilyn would have required in order to obtain
17	Q Let me show you Exhibit No. 9.	17		the family leave act?
18	A Do you want 4?	18		MR. TOKUS: Objection, that's not
19		19	_	the state of the record at this time.
20		20	•	Go ahead.
21		21		I believe this would be it.
22		22	-	And then the forms would be processed by you?
23	A Must have been January 14th, 2000.	23		Correct.
24		24	Q	All right. Let me have those records. Let me ask
25		25		you to assume that this medical release was received
	141			143
1	A Idon't know.	1		by the Mayor. Did the Mayor ever discuss this
2	Q You don't know? Now, these records that we have	2		medical release with you?
3	identified, the one that is before you and your	3	Α	The Mayor never discussed Marilyn Figueroa with me
4	discussions with Mr. Hansen, did you ever place	4		period.
5	those records in Marilyn's personnel file?	5		
			Q	Did Mr. Soika ever discuss this medical record with
ıη		6	Q	Did Mr. Soika ever discuss this medical record with you?
6	A This one?			Did Mr. Soika ever discuss this medical record with you? No.
7	A This one? Q Yes.	6	A	you? No.
7 8	A This one?Q Yes.A I believe this came from her personnel file.	6 7 8	A	you? No. To this date has he ever discussed this medical
7 8 9	A This one?Q Yes.A I believe this came from her personnel file.Q Is that correct?	6 7 8 9	A Q	you? No. To this date has he ever discussed this medical record with you?
7 8 9 10	 A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. 	6 7 8 9 10	A Q A	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no.
7 8 9 10 11	 A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file 	6 7 8 9 10 11	A Q A	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would
7 8 9 10 11	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter?	6 7 8 9 10 11 12	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised?
7 8 9 10 11 12	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did.	6 7 8 9 10 11 12 13	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very.
7 8 9 10 11 12 13	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right.	6 7 8 9 10 11 12 13	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for
7 8 9 10 11 12 13 14	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for	6 7 8 9 10 11 12 13 14 15	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification)
7 8 9 10 11 12 13 14 15	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification)	6 7 8 9 10 11 12 13 14 15 16	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record
7 8 9 10 11 12 13 14 16	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read	6 7 8 9 10 11 12 13 14 15 16	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple
7 8 9 10 11 12 13 14 15 16	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want	6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you.
7 8 9 10 11 12 13 14 15 16 17	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look	6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to
7 7 8 9 100 111 122 133 144 155 166 179 179 179 179 179 179 179 179 179 179	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel?
77 88 99 100 111 122 131 141 151 111 111 122 22	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents. (Witness looking at exhibit)	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel? MR. ARELLANO: Correct, correct.
7 8 9 10 11 12 13 14 15 18 11 12 2 2 2 2 2	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents. (Witness looking at exhibit) Q Have you ever seen this document before, ma'am?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel? MR. ARELLANO: Correct, correct. MR. TOKUS: All right.
7 8 8 9 9 100 111 12 13 14 15 16 17 18 19 2 2 2 2 2 2	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents. (Witness looking at exhibit) Q Have you ever seen this document before, ma'am? A I would say no.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel? MR. ARELLANO: Correct, correct. MR. TOKUS: All right. (Witness looking at exhibit)
7 8 8 9 100 111 122 133 144 155 166 175 185 185 185 185 185 185 185 185 185 18	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents. (Witness looking at exhibit) Q Have you ever seen this document before, ma'am? A I would say no. Q Is it your sworn testimony that today is the first	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel? MR. ARELLANO: Correct, correct. MR. TOKUS: All right. (Witness looking at exhibit) Take your time, take your time. Now, I want you to
7 8 8 9 9 100 111 12 13 14 15 16 18 19 2 2 2 2 2 2 2	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents. (Witness looking at exhibit) Q Have you ever seen this document before, ma'am? A I would say no. Q Is it your sworn testimony that today is the first time you've seen this document?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel? MR. ARELLANO: Correct, correct. MR. TOKUS: All right. (Witness looking at exhibit) Take your time, take your time. Now, I want you to look at her records. And I just want you to confirm
7 8 9 100 111 122 133 144 155 165 175 175 175 175 175 175 175 175 175 17	A This one? Q Yes. A I believe this came from her personnel file. Q Is that correct? A I believe it is. Q Did you place these records in her personnel file when you received them or shortly thereafter? A I believe I did. Q All right. (Exhibit No. 10 marked for identification) Q Let me show you Exhibit No. 10. I want you to read it carefully, you. He has read it plenty. I want you to read it carefully, look at the date and look at the contents. (Witness looking at exhibit) Q Have you ever seen this document before, ma'am? A I would say no. Q Is it your sworn testimony that today is the first	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q Q	you? No. To this date has he ever discussed this medical record with you? As far as I can recollect, no. If he knew of this record and didn't tell you, would you be surprised? Very. (Exhibit No. 11 marked for identification) Let me ask you to do this for me. Read this record and when you're done reading it, I have a couple questions for you. MR. TOKUS: Are we referring to Exhibit 11, counsel? MR. ARELLANO: Correct, correct. MR. TOKUS: All right. (Witness looking at exhibit) Take your time, take your time. Now, I want you to

Cusi		<u> </u>	
1	wasn't on FMLA leave. I don't know why it says "you	1	Q Confidentially?
2	will no longer receive compensation while on FMLA."	2	A It says done.
3	Q Do you have any explanation	3	Q Did you do that?
4	A No.	4	A Keep a copy of the signed letter, done,
5	Q as to why?	5	February 2nd. Send a copy to Jeff Hansen. I did it
6	A Unless the wording in this is incorrect, it just	6	on February 2nd. Make a copy for Mr. Soika. It was
7	meant regular sick leave, accumulated sick leave.	7	done on February 2nd. Everything was done on
8	Sick leave is different from FMLA.	8	February 2nd.
9	Q What's the difference?	9	Q Do you recall during Mayor Norquist's
10	A I can't tell you right now because I don't know.	10	administration, do you recall ever being involved in
111	But it is different than regular accumulated sick	11	the termination of any other employee in the Mayor's
12	leave that you get with the City.	12	office?
•	Q Do you know when she was actually considered	13	A It seems vaguely Mr. Taylor. I don't know whether
13	terminated from the City?	14	he was terminated or what happened. I think he
14	A I don't have the exact date. I would say according	15	might have been terminated, but I'm not positive.
15	to my records, January 22nd would be the last, the	16	Q Who was Mr. Taylor?
16	to my records, january 22nd would be the last, the	17	A I think his title was staff assistant to the Mayor.
17	first day she did not receive payment from the City.	18	Q Is this a white person, black person, brown person?
18	The last day on the payroll, according to this, is	19	A Black.
19	January 21st. And according I believe to do	20	Q Green?
20	you have the time cards?	21	A Black male.
21	Q Right here.	22	Q And you believe he was terminated?
22	A Yes. MR. TOKUS: Now the witness has	23	· ·
23	before her what has been marked for her	24	Q Do you know who terminated him?
24		25	
25	deposition Exhibit 6 excuse me. Yes, 149	23	151
	143	<u></u>	
<u> </u>		Ι.	
1	Stawicki Exhibit 6.	1	Q Right.
2	A We're going over to this is the last okay.	2	A No, I don't.
•	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of	2	A No, I don't. Q Was that Mr. Soika?
2	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank	2 3 4	A No, I don't. Q Was that Mr. Soika? A No.
2 3	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to	2 3 4 5	A No, I don't.Q Was that Mr. Soika?A No.Q Was that Mr. Rowen?
2 3 4	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day	2 3 4 5 6	A No, I don't.Q Was that Mr. Soika?A No.Q Was that Mr. Rowen?A I don't know.
2 3 4 5 6 7	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee.	2 3 4 5 6 7	A No, I don't.Q Was that Mr. Soika?A No.Q Was that Mr. Rowen?A I don't know.Q Was it Mr. Christofferson?
2 3 4 5 6	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for	2 3 4 5 6 7 8	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know.
2 3 4 5 6 7	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification)	2 3 4 5 6 7 8	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his
2 3 4 5 6 7 8	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record,	2 3 4 5 6 7 8 9	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination?
2 3 4 5 6 7 8 9 10	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12.	2 3 4 5 6 7 8 9 10	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember.
2 3 4 5 6 7 8 9 10 11 12	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay.	2 3 4 5 6 7 8 9 10 11	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the
2 3 4 5 6 7 8 9 10 11 12 13	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before?	2 3 4 5 6 7 8 9 10 11 12 13	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual?
2 3 4 5 6 7 8 9 10 11 12 13	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me.	2 3 4 5 6 7 8 9 10 11 12 13	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A No. I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A No. I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes. Q And did you do that? A I don't remember.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A No. I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen? A I think he meant that I should keep the letter
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes. Q And did you do that? A I don't remember. Q And then you were asked to keep a letter in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen? A I think he meant that I should keep the letter confidential Marilyn the letter to Marilyn
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes. Q And did you do that? A I don't remember.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A No. I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen? A I think he meant that I should keep the letter confidential Marilyn the letter to Marilyn confidential and not spread office gossip. He
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes. Q And did you do that? A I don't remember. Q And then you were asked to keep a letter in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 A No. I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen? A I think he meant that I should keep the letter confidential Marilyn the letter to Marilyn confidential and not spread office gossip. He didn't want it shared with office staff, I believe.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes. Q And did you do that? A I don't remember. Q And then you were asked to keep a letter in Marilyn Figueroa's file and to send a letter to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A No, I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen? A I think he meant that I should keep the letter confidential Marilyn the letter to Marilyn confidential and not spread office gossip. He didn't want it shared with office staff, I believe. That would be
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A We're going over to this is the last okay. Pay period 2 the last date I have her 2.9 hours of sick leave, and then pay period 3 I have a blank time card that says no pay, which would lead me to believe that Friday, January 21st was her last day being paid with the City of Milwaukee. (Exhibit No. 12 marked for identification) Q Let me ask you to review this record, Exhibit No. 12. A Okay. Q Have you ever seen this record before? A I must have if it's addressed to me. Q Let me have a look at that. A Yes. Q As I understand, you were requested to prepare the termination letter of Marilyn Figueroa; correct? A According to that, yes. Q And did you do that? A I don't remember. Q And then you were asked to keep a letter in Marilyn Figueroa's file and to send a letter to Mr. Hansen; is that correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 A No. I don't. Q Was that Mr. Soika? A No. Q Was that Mr. Rowen? A I don't know. Q Was it Mr. Christofferson? A I don't know. Q Were you at all involved in processing his termination? A I don't know. I can't remember. Q Do you know if Mr. Hansen was involved in the termination of this individual? A I don't know. Q Were you ever asked to type the termination letter? A For Mr. Taylor? Q Right. A I don't think so. I don't know. Q Did Mr. Soika ever explain to you why he wanted you to keep that letter confidential to Mr. Hansen? A I think he meant that I should keep the letter confidential Marilyn the letter to Marilyn confidential and not spread office gossip. He didn't want it shared with office staff, I believe.

	se compress Deposition of 17(11(10)			
1	personal things?	1	Α	I don't think anyone in the office keeps a record.
2	MR. ARELLANO: Things that belonged	2		It's kind of an honor system I believe.
3	to her.	3	Q	Honor means that it's honor whenever somebody
4	MR. TOKUS: Okay. I'll look into	4		demands it?
5	that.	5	Α	No. I think people, if they work at night a
6	Q Who instructed you to clean her desk?	6		three-hour period, they might go and ask or say I
7	A I don't know.	7		need a half a day off and I worked blah blah blah,
8	Q You don't know that one either.	8		and then they would say okay.
9	A No, sorry.	9	0	What about time cards that do the time cards
10	Q All right. Well, what prompted you to clean her	10	~	reflect any comp time?
11	desk?	11	Α	No. Management employees are not permitted to get
12	A Someone must have told me, but I don't know who it	12	,,	overtime, I believe.
13	was.	13	0	All right.
14	Q Are you the person that keeps strike that. Are	14	_	So it just shows they work 80 hours. If they work a
15	there sign-in and sign-out sheets for the office?	15	,,	hundred hours every two weeks, it doesn't reflect
16	A Yes.	16		that on the time card.
		17	Λ	What about records reflected to flex time? Who
17	Q And are you the person that keeps those sign-in	18	Ų	would keep those records?
18	A No.	19	Δ	That would be the same as the overtime hours; no
19	Q Who keeps them?	20	$^{\wedge}$	·
20	A The receptionist. Right now they're only kept on a	21	Ω	one.
21	daily basis and then they're dumped.	22	Ų	Do you recall people ever stuffing envelopes for
22 23	Q For how long are they kept?	23	۸	political campaigns in the office? No.
24	A They should be kept on a daily basis, but I keep	24		Has that ever been done?
25	them for a two-week basis so I can compare them with	25	_	I don't recall.
23	time cards that are submitted. But the receptionist 157	23	Λ	159
				100
<u> </u>				
1	is the one that gets them initially. Then they go	1	Q	Do you remember Marilyn ever complaining to you
2	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn	2	Q	about losing hours to political work that she was
1	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week	2		about losing hours to political work that she was doing?
2 3 4	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them.	2 3 4	Α	about losing hours to political work that she was doing? She might have, yes.
2 3 4 5	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email,	2 3 4 5	A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you?
2 3 4	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that?	2 3 4 5 6	A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry.
2 3 4 5 6 7	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens	2 3 4 5 6 7	A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of
2 3 4 5 6 7 8	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of	2 3 4 5 6 7 8	A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's
2 3 4 5 6 7 8 9	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent	2 3 4 5 6 7 8	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office.
2 3 4 5 6 7 8 9	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a	2 3 4 5 6 7 8 9	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies,
2 3 4 5 6 7 8 9 10	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that	2 3 4 5 6 7 8 9 10	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget,
2 3 4 5 6 7 8 9 10 11 12	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person.	2 3 4 5 6 7 8 9 10 11	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of
2 3 4 5 6 7 8 9 10 11 12 13	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails?	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties
2 3 4 5 6 7 8 9 10 11 12 13 14	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's
2 3 4 5 6 7 8 9 10 11 12 13 14 15	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes. Q Now, you also testified that staff members are	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand. Time cards.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes. Q Now, you also testified that staff members are entitled to take comp time but you don't keep	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand. Time cards. Does my office keep track of the time cards?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes. Q Now, you also testified that staff members are entitled to take comp time but you don't keep records of this?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand. Time cards. Does my office keep track of the time cards? Right.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes. Q Now, you also testified that staff members are entitled to take comp time but you don't keep records of this? A I don't keep records, no.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand. Time cards. Does my office keep track of the time cards? Right. Look at each one of them?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes. Q Now, you also testified that staff members are entitled to take comp time but you don't keep records of this? A I don't keep records, no. Q Do you know who would keep records of time that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand. Time cards. Does my office keep track of the time cards? Right. Look at each one of them? Right.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	is the one that gets them initially. Then they go to the planning coordinator, and then he in turn gives them to me. And then after the two-week period I destroy them. Q When something comes into the office, mail, email, how do you process that? A The receptionist goes down for the mail. She opens it, puts it all together, time stamps it. Most of it goes in to Ruth Wyttenbach. If it's apparent that it goes to someone else that's working on a special project, she might take it right into that person. Q What about the emails? A Emails, it goes to whoever it's addressed to. It automatically goes on the computer. Q Are they stamped, marked when they arrive? A Emails are electronic mail through the computer. Q So they're all automatically dated? A Yes. Q Now, you also testified that staff members are entitled to take comp time but you don't keep records of this? A I don't keep records, no.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A Q A Q A Q A Q A Q	about losing hours to political work that she was doing? She might have, yes. What did she tell you? I don't remember, I'm sorry. Tell me in a summary fashion what is the extent of your duties and responsibilities within the Mayor's office. I do budgetary work. I do the ordering of supplies, paying of all the bills, preparing the budget, monitoring budgetary accounts, payroll, kind of supervisor over clerical and other various duties that I might be assigned to like typing somebody's letter or whatever. I don't have any one person that I'm assigned to. If somebody's busy, I'll take a letter and type it for them or whatever. Does your office keep track of time records as well? I'm sorry, I don't understand. Time cards. Does my office keep track of the time cards? Right. Look at each one of them?

			A 21 - (0 - 1
1	on September 30th 1 believe through October 23rd or	1	A Not offhand, no.
2	something like that	2	Q Before Mr. Soika asked you to prepare the letter of
3	Q Did she notify your office before she took sick	3	termination of Marilyn Figueroa, did he ever talk to
4	leave? Did she call and say I'm going to be on sick	4	you and tell you what his plans were with respect to
5	leave?	5	Marilyn Figueroa?
1	A I don't think so. I'm not sure.	6	A I don't think so.
6		7	Q No? Okay. Before coming here today, did you review
7	Q So she never called or anything?	8	any transcript testimony of other witnesses?
8	A I'm not positive about any of that.		A No.
9	Q Do you know if anyone called her doctor?	9	
10	A I believe at one point someone did call her doctor.	10	Q Did anyone talk to you about what other witnesses
11	I don't know who it was.	11	testified in this case?
12	Q Do you know what the findings were after talking to	12	A What they testified?
13	her doctor?	13	Q Correct.
14	A No, I don't. It might be in her payroll file. I'm	14	A No, no.
15	not sure.	15	Q What about Ms. Wyttenbach? Has she spoken to you
16	Q Any other person that you recall that was terminated	16	about her testimony?
17	because of sick leave problems?	17	A What she said in her testimony?
18	A No.	18	Q Right.
19	Q All right, very good. So if anyone was involved in	19	À No.
20	doing political campaign work, you would not keep	20	Q What happened in this deposition?
		21	A No.
21	those records, would you?	22	Q Did she tell you that she had come to a deposition?
22	A No.	23	A I knew she had.
23	Q If anyone was involved in political campaign work on	24	O My question is did she tell you that?
24	behalf of the Mayor, who would keep records of that,		A Maybe not me personally, but I found out through the
25	if you know?	25	167
	165	L	107
-	100	ļ	
1		1	receptionist as she was leaving. She said she's
1 2	A I don't know. Generally when somebody's going to be	1 2	going.
2	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time.	1	going. Q Have you attended any meetings where the subject of
2 3	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about	2	going.
2 3 4	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct?	2 3	going. Q Have you attended any meetings where the subject of
2 3 4 5	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. 	2 3 4	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed?
2 3 4 5 6	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about	2 3 4 5	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000,
2 3 4 5 6 7	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? 	2 3 4 5 6	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where
2 3 4 5 6 7 8	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't 	2 3 4 5 6 7	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed?
2 3 4 5 6 7 8 9	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. 	2 3 4 5 6 7 8 9	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings.
2 3 4 5 6 7 8 9	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn	2 3 4 5 6 7 8 9	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did
2 3 4 5 6 7 8 9 10	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? 	2 3 4 5 6 7 8 9 10	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson,
2 3 4 5 6 7 8 9 10 11 12	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. 	2 3 4 5 6 7 8 9 10 11 12	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office?
2 3 4 5 6 7 8 9 10 11 12 13	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a 	2 3 4 5 6 7 8 9 10 11 12 13	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A tone time?
2 3 4 5 6 7 8 9 10 11 12 13 14	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City?	2 3 4 5 6 7 8 9 10 11 12 13 14	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes.
2 3 4 5 6 7 8 9 10 11 12 13	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so.
2 3 4 5 6 7 8 9 10 11 12 13 14	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you? A Oh, yes. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine. MR. ARELLANO: We'll let you go
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you? A Oh, yes. Q Are there other memos or emails, messages, faxes	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine. MR. ARELLANO: We'll let you go earlier. Nice meeting you, ma'am. Those
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you? A Oh, yes. Q Are there other memos or emails, messages, faxes related to Marilyn Figueroa that may not be in her	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine. MR. ARELLANO: We'll let you go earlier. Nice meeting you, ma'am. Those records will be kept here with the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you? A Oh, yes. Q Are there other memos or emails, messages; faxes related to Marilyn Figueroa that may not be in her personnel file?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine. MR. ARELLANO: We'll let you go earlier. Nice meeting you, ma'am. Those records will be kept here with the professional reporter.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you? A Oh, yes. Q Are there other memos or emails, messages, faxes related to Marilyn Figueroa that may not be in her personnel file? A I don't know.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine. MR. ARELLANO: We'll let you go earlier. Nice meeting you, ma'am. Those records will be kept here with the professional reporter. (Adjourning at 2:30 P.M.)
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A I don't know. Generally when somebody's going to be out doing campaign work they take vacation time. Q You testified that two people spoke poorly about Marilyn Figueroa's conduct; correct? A Yes. Q Have you told me everything that you know about Marilyn Figueroa's conduct? A I don't know if what they said is true. I don't know it to be a fact. Q But you personally have never witnessed Marilyn engaging in any type of sexual misbehavior? A No, no, not at all. Q All right. Did you get to see Marilyn Figueroa on a regular basis when she was working for the City? A Yes. Q How would you describe your relationship with Marilyn Figueroa? A Friendly. Q Was she respectful towards you? A Oh, yes. Q Are there other memos or emails, messages; faxes related to Marilyn Figueroa that may not be in her personnel file?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	going. Q Have you attended any meetings where the subject of Marilyn Figueroa was discussed? A No. Q Back after she left on January 4th of the year 2000, do you recall any meetings held in the office where Marilyn Figueroa was discussed? A I don't know of any meetings. Q After Marilyn Figueroa left in January of 2000, did you ever see Mayor Norquist's wife, Christofferson, Soika, Attorney Shindell in the office? A At one time? Q Yes. A I don't I don't think so. MR. ARELLANO: We're going to review all other files, and if we need to talk to you again, we will let your attorneys know. Is that okay with you? THE WITNESS: That's fine. MR. ARELLANO: We'll let you go earlier. Nice meeting you, ma'am. Those records will be kept here with the professional reporter.

•