

EXHIBIT D

Sheridan, Gerard - Vol. 4 9/15/2015 9:16:00 AM

IN AND FOR THE DISTRICT OF ARIZONA

MANUEL DE JESUS ORTEGA)

MELENDRES, et al.,)

)

Plaintiffs,)

)

vs.)No. CV-07-2513-PHX-GMS

)

JOSEPH M. ARPAIO, et al.,)

)

Defendants.)

)

VIDEOTAPED DEPOSITION OF GERARD SHERIDAN

VOLUME IV

(Pages 355 to 685, inclusive)

Phoenix, Arizona

September 15, 2015

9:16 a.m.

REPORTED BY:

PAMELA A. GRIFFIN, RPR, CRR

Certified Reporter

Certificate No. 50010

PREPARED FOR:

CONDENSED/ASCII

(Certified Copy)

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1 and lack of performance flies in the face of his numerous
2 promises pledging to complete the work," et cetera.

3 Seems to me based on this e-mail that
4 Mike Zullo was still demanding work product from
5 Dennis Montgomery as of April 20th, 2015.

6 Did you know that that was happening?

7 MR. MASTERSON: Foundation.

8 THE WITNESS: I know that we had paid
9 Dennis Montgomery an awful lot of money, and he had
10 nothing to show for it, and that on occasion Mike would
11 contact him. Yes, I was aware of that.

12 BY MS. WANG:

13 Q. And you're aware that Mike Zullo was doing that
14 up till April 20th of 2015?

15 MR. MASTERSON: Form. Foundation.

16 MR. WALKER: Join.

17 THE WITNESS: I don't recall when, but
18 obviously this e-mail gives me that date.

19 BY MS. WANG:

20 Q. And -- okay.

21 Do you recall a meeting about the Seattle
22 investigation on or about January 2nd, 2014? And this
23 would have been with Travis Anglin, Tim Casey, Tom Liddy,
24 John Masterson, Joe Popolizio.

25 A. No.

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