## 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, )
                  )No. CV-07-2513-PHX-GMS
       VS.
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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1	STATE OF ARIZONA )
2	) ss. COUNTY OF MARICOPA )
2	·
3	BE IT KNOWN that the foregoing proceedings were
1	taken before me; that the witness before testifying was
4	duly sworn by me to testify to the whole truth; that the
_	foregoing pages are a full, true, and accurate record of
5	the proceedings, all done to the best of my skill and
6	ability; that the proceedings were taken down by me in
6	shorthand and thereafter reduced to print under my direction.
7	direction.
•	I CERTIFY that I am in no way related to any of
8	the parties hereto, nor am I in any way interested in the
Ū	outcome hereof.
9	
10	[X] Review and signature was requested.
	[] Review and signature was waived.
11	[] Review and signature not required.
12	
	I CERTIFY that I have complied with the ethical
13	obligations set forth in ACJA 7-206(F)(3) and ACJA 7-206
	J(1)(g)(1) and (2).
14	Dated at Phoenix, Arizona, this [!DATE] day of
	[!MONTH], 2015.
15	
16	
17	PAMELA A. GRIFFIN, RPR, CRR
	Certified Reporter
18	Arizona CR No. 50010
19	
	* * * * *
20	LOEDTIEVAL A ODJETINA A OOOOLATEO A LOCA
21	I CERTIFY that GRIFFIN & ASSOCIATES, LLC, has
00	complied with the ethical obligations set forth in ACJA
22	7-206 (J)(1)(g)(1) through (6).
23	
24	GRIFFIN & ASSOCIATES, LLC
<b>∠</b> ⊣	Registered Reporting Firm
25	Arizona RRF No. R1005
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