Case 1:15-cv-07433-LAP
EXHIBIT 8

Page	1	Page
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA	1 2	IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUI IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 08-CIV-80119-MARRAJIOHNSON	3	CASE NO. 502008CA028051XXXXMB AB
	4	L.M.,
JANE DOE NO. 2, Plaintiff.	5	Plaintiff,
vs- VOLUME LOF III	6	-vs- VOLUME I OF III
JEFFREY EPSTEIN,	7	JEFFREY EPSTEIN,
Defendant	8	Defendant.
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Related cases:	10	
08-80232, 08-08380, 08-80381, 08-80994 08-80993, 08-80811, 08-80893, 09-80469	111	Alle France and the world Address to Alle States
09-80591, 09-80656, 09-80802, 09-81092	12	VIDEOTAPED DEPOSITION OF SARAH KELLEN
	14	SAKAH KULUN
VIDEOTAPED DEPOSITION OF	15	Wednesday, March 24, 2010
SARAH KELLEN		10:37 - 6:51 p.m.
	16 17	
Wednesday, March 24, 2010 10:37 - 6:51 p.m.	18	250 Australian Avenue South
		Suite 1500
250 Australian Avenue South	1.9	West Palm Beach, Florida 33401
Suite 1500 West Palm Beach, Florida 33401	20	
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	, a. c.	Reported By: Cynthia Hopkins, RPR, FPR
Reperied By:	23	Notary Public, State of Florida
Cynthia Hopkins, RPR, FPR Notary Public, State of Florida	Ē	Prose Court Reporting Services
Prose Court Reporting Services	24	Job No.: 1484
Job No.: 1484	25	
Page 1	2	Fage
IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT	1	IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
IN AND FOR PALM BEACH COUNTY, FLORIDA		CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 502008CA028058XXXXMB AD	3	CASE No.502008CA037319XXXXMB AB
E.W.,	1 3	B.B.
J	4	
Plaintiff,	5	Plaimiff,
-vs- VOLUME (OF III	6	-vs- VOLUME I OF III
JEFFREY EPSTEIN,		JEFFREY EPSTEIN
and the second s	8	AND SARAH KELLEN,
Defendant.	0	Defendants
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VIDEOTAPED DEPOSITION OF	10	GONDAN A DELLA EMPARISMENTALI ANI
SARAH KELLEN	111	VIDEOTAPED DEPOSITION OF SARAH KELLEN
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Wednesday, March 24, 2010 10:37 - 6.51 p.m.	14	Wednesday, March 24, 2010
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250 Australian Avenue South Suite 1500	17	250 Australian Avenue South
West Palm Beach, Florida 33401	16	Suite 1500 West Palm Beach, Florida 33401
	19	ivest Patti Beach, Ciorida 33401
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	21	A CARLES AVA
Reported By		Reported By:
Reported By: Cynthia Hopkins, RPR, FPR		
Cynthia Hopkins, RPR, FPR Notary Public, State of Florida		Cynthia Hopkins, RPR, FPR
Cynthia Hopkins, RPR, FPR	23	

1 (Pages 1 to 4)

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	Page 21		Page 23
1	answer the question based on her Fifth	1	witness, and I will instruct the witness not to
2	Amendment privilege.	2	answer based on her Fifth Amendment privilege.
3	THE WITNESS: On the instruction of my	3	THE WITNESS: On the instruction of my
4	lawyer, I must invoke my Fifth Amendment right.	4	lawyer, I must invoke my Fifth Amendment right.
1	Y MR. KUVIN:	5	BY MR, KUVIN:
6	Q. Who introduced you to Jeffrey Epstein the	6	Q. Would you agree with me that
1	st time that you met him?	7	Jeffrey Epstein owns numerous planes, private
8	MR. RHEINHART: Same instruction.	8	planes?
9	THE WITNESS: On the instruction of my	9	MR. RHEINHART: Instruct the witness not
10	lawyer, I must invoke my Fifth Amendment right.	10	to answer.
	Y MR. KUVIN:	11	THE WITNESS: On the instruction of my
12	Q. Did Ghislaine Maxwell introduce you to	12	lawyer, I must invoke my Fifth Amendment right.
	ffrey Epstein for the first time?	13	BY MR. KUVIN:
14	MR. RHEINHART: Same instruction.	14	Q. And you've been on every one of those
15	THE WITNESS: On the instruction of my	15	private planes; isn't that true?
16	lawyer, I must invoke my Fifth Amendment right.	16	MR. RHEINHART: Object to the form. It
	' MR. KUVIN:	17	assumes facts not before the witness, and I
18	A Theorem 1	18	will instruct the witness not to answer based
	Q. When was the first time you were in	1	
	ffrey Epstein's home located on El Brillo Way on	19	on her Fifth Amendment privilege.
	Im Beach Island?	20	THE WITNESS: On the instruction of my
21	MR. RHEINHART: Object to the form of the	21	lawyer, I must invoke my Fifth Amendment right.
22	question as compound and assuming facts not	22	BY MR. KUVIN:
23	before the witness. And I instruct the witness	23	Q. Ma'am, isn't it true that you've seen the
24	not to answer based on her Fifth Amendment	24	passenger manifest for Jeffrey Epstein's plane?
25	privilege.	25	MR. RHEINHART: Object to the form. It
	Page 22		Page 24
1	THE WITNESS: On the instruction of my	1	assumes facts that are not established as known
2	lawyer, I must invoke my Fifth Amendment right.	2	to this witness, and I instruct the witness not
3 BY	MR. KUVIN:	3	to answer the question based on her Fifth
4	Q. Would you agree with me that	4	Amendment privilege.
5 Jef	ffrey Epstein owns a home at 358 El Brillo Way,	5	THE WITNESS: On the instruction of my
6 Pai	lm Beach Island, Florida?	6	lawyer, I must invoke my Fifth Amendment right.
7	MR. RHEINHART: Instruct the witness not	7	MR. KUVIN: Let me show you what we'll
8	to answer based on her Fifth Amendment	8	mark as Exhibit 2.
9	privilege.	9	
10	THE WITNESS: On instruction of my	10	(Plaintiff's Exhibit No. 2 was marked for
L 1.	counsel, I must invoke my Fifth Amendment	11	identification.)
	right.	12	MR. KUVIN: Thank you.
	MR. KUVIN:	13	MR. RHEINHART: Do you want to zoom in on
	Q. Would you agree with me that you've been	1.4	it like you did the last time?
	that home numerous times?	15	MR KUVIN: No, that's fine
16	MR. RHEINHART: Instruct the witness not	16	MR. RHEINHART: Take your time.
	to answer the question based on her Fifth	17	MR. KUVIN: And flip through.
	Amendment privilege.	18	BY MR. KUVIN;
19	THE WITNESS: On instruction of my lawyer,	19	Q. All right. Ma'am, would you agree with me
	I must invoke my Fifth Amondment right.	20	that this is a passenger manifest for one of
	MR. KUVIN:	21	Jeffrey Epstein's airplanes?
		22	MR, RHEINHART: Instruct the witness not
	Q. Would you agree with me that you have gone	23	
	Jeffrey Epstein's plane numerous times?	23	to answer the question based on her Fifth
24 25	MR. RHEINHART: Object to the form. It assumes facts that are not present for the		Amendment privilege, THE WITNESS: On the instruction of my
	assumes racis mar are not present for the	25	THE WILDESS: OF THE INSTRUCTION OF MY

6 (Pages 21 to 24)

	Page 37		Page 39
1	THE VIDEOGRAPHER: We're now on video	1	personal knowledge and instruct her not to
2	record at 11:01 a.m.	2	answer based on her Fifth Amendment privilege.
3	MR. KUVIN: Just for the video record and	3	It's also compound.
4	for the written record Katherine Ezell and Amy	4	THE WITNESS: On the instruction of my
5	Ederi have now appeared and are present in	5	lawyer I must invoke my Fifth Amendment
6	person.	6	privilege.
7	MR. GOLDBERGER: Just one more matter for	7	BY MR. KUVIN:
8	the record. Jack Goldberger, on behalf of	8	Q. The witness says that you may not have
9	Jeffrey Epstein. Rather than impose a form	9	knowledge or we don't know whether you have
10	objection to every question, I think we have	10	knowledge regarding this passenger manifest, so let
11	reached an agreement that on behalf of	11	me ask you, do you have any knowledge about this
12	Mr. Epstein, I am adopting the form objections	12	passenger manifest?
13	that Mr. Rheinhart is making on behalf of his	13	MR. RHEINHART: Object to the form of the
1.4	client nunc pro tune to the beginning of this	14	question as ambiguous as to this and what a
1.5	deposition.	15	manifest is, and also her knowledge, and I will
16	MR. KUVIN: No objection.	16	instruct her not to answer based on her Fifth
17	MR. GOLDBERGER: Okay	17	Amendment privilege.
18	BY MR. KUVIN:	18	THE WITNESS: On the instruction of my
1.9	Q. All right. All right. Ms. Kellen, would	19	lawyer, I must invoke my Fifth Amendment
20	you agree with me that there was an agreement	20	privilege.
21	between Jeffrey Epstein, Ghislaine Maxwell,	21	BY MR. KUVIN:
22	Jean-Luc Brunel, yourself and Nadia Marcinkova to	22	Q. Based on the objection, do you know what a
23	bring in girls from out of state that were underage?	23	manifest is?
24	MR, RHEINHART: Object to the form of the	24	MR. RHEINHART: Object to the form of the
2.5	question as leading, as compound, and instruct	25	question as ambiguous and instruct her not to
	Page 38		Page 40
1	the witness not to answer based on her Fifth	1	answer based on her Fifth Amendment privilege.
2	Amendment privilege	2	THE WITNESS: On the instruction of my
3	THE WITNESS: On the instruction of my	3	lawyer I must invoke my Fifth Amendment right.
4	lawyer I must invoke my Fifth Amendment right.	4	BY MR. KUVIN:
5	BY MR. KUVIN:	5	Q. Have you heard the word "manifest" before?
6	Q. Would you agree with me that there was an	6	MR. RHEINHART: I'll instruct the witness
7	agreement between Jeffrey Epstein,	7	not to answer based on her Fifth Amendment
8	Ghislaine Maxwell, Jean-Luc Brunel, yourself and	8	privilege.
9	Nadia Marcinkova to bring in girls that were	9	THE WITNESS: On the instruction of my
10	underage from out of state for sexual contact?	10	lawyer I must invoke my Fifth Amendment right.
11	MR. RHEINHART: Object to the form of the	11	BY MR. KUVIN:
12	question as leading and compound, and I	12	Q. Would you agree with me, ma'am, that you
13	instruct the witness not to answer based on her	13	have seen this passenger manifest, listed as
14	Fifth Amendment privilege.	14	Exhibit 3, in the past?
15	THE WITNESS: On the instruction of my	15	MR. RHEINHART: I'll instruct the witness
1.5	lawyer I must invoke my Fifth Amendment	16	not to answer based on her Fifth Amendment
17	privilege.	17	privilege.
18	BY MR. KUVIN:	18	THE WITNESS: On the instruction of my
19	Q. All right. Let me show you what we've	19	lawyer I must invoke my Fifth Amendment right.
20	premarked as Plaintiff's Exhibit 3. Do you	20	BY MR. KUVIN:
21	recognize this as the passenger manifest for one of	21	Q. Who is Zinta Broukis?
22	Jeffrey Epstein's planes?	22	MR. RHEINHART: I'll instruct the witness
an in	MR. RHEINHART: I object to the form of	23	not to answer based on her Fifth Amendment
23			
23 24 25	the question. It assumes facts that this witness, evidence that this witness has no	24 25	privilege. THE WITNESS: On the instruction of my

10 (Pages 37 to 40)

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	Page 97		Page 99
1	MR. RHEINHART: Same instruction.	1	assumes facts that have not been established
2	THE WITNESS: On the instruction of my	2	and it's compound.
3	lawyer, I must invoke my Fifth Amendment	3	THE WITNESS: On the instruction of my
4	privilege.	4	lawyer, I must invoke my Fifth Amendment
5	BY MR. KUVIN:	5	privilege.
6	Q. Have you ever worked as a professional	6	MR. RHEINHART: And to clarify the
7	model?	7	objection is that it assumes that she's ever
8	MR RHEINHART: May I consult?	8	met or knows anything about Jean-Luc Brunel.
9	MR, KUVIN: Sure.	9	BY MR. KUVIN:
10	MR RHEINHART: You can answer the	10	Q. Were you ever promised anything regarding
11	question.	11	your modeling career by Jeffrey Epstein?
12	THE WITNESS: Yes.	12	MR. RHEINHART: Same objection, instruct
13	BY MR. KUVIN:	13	the witness not to answer.
14	Q. When?	14	THE WITNESS: On the instruction of my
15	A. I don't remember. I don't remember the dates.	15	lawyer, I must invoke my Fifth Amendment
16	It was at least maybe ten years ago.	16	privilege.
1/7	Q. And you're how old now?	17	BY MR. KUVIN:
18	MR. RHEINHART: I'll instruct the witness	18	Q. You would agree with me that there is a
19	not to answer the question. Nice try.	19	financial arrangement between Jean-Luc Brunel and
20	Instruct you not to answer based on	20	Jeffrey Epstein, do you not?
21	your Fifth Amendment privilege.	21	MR. RHEINHART: Objection. It assumes she
22	THE WITNESS: On the instruction of my	22	has any knowledge of either Mr. Epstein or
23	lawyer, I'm going to invoke my Fifth Amendment	23	Mr. Brunel, and as to that she is going to
24	privilege.	24	mvoke her Fifth Amendment privilege. The
25	MR. KUVIN: I'm just trying to find out.	25	question is compound and therefore ambiguous.
	Page 98	4 A	Page 100
1	MR. RHEINHART: Like I said, good try.	1	THE WITNESS: On the instruction of my
2	Move on.	2	lawyer, I must invoke my Fifth Amendment
3	BY MR. KUVIN:	3	
4			privilege.
~2	O. With respect to your work as a		privilege. BY MR, KUVIN:
5	Q. With respect to your work as a professional model, what company did you work for?	4 5	BY MR. KUVIN:
	Q. With respect to your work as a professional model, what company did you work for? MR, RHEINHART: Instruct the witness not	4	BY MR. KUVIN: Q. Would you agree with me that
5	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not	4 5	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to
5 6	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment	4 5 6	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex?
5 6 7	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege.	4 5 6 7	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to
5 6 7 8	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: On the instruction of my	4 5 6 7 9	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex? MR. RHEINHART: Objection to the form. It
5 7 8 9	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: On the instruction of my lawyer, I invoke my Fifth Amendment privilege.	4 5 6 7 9	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex? MR. RHEINHART: Objection to the form. It assumes she knows anything at all about
5 7 8 9 10	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: On the instruction of my lawyer, I invoke my Fifth Amendment privilege. BY MR. KUVIN:	4 5 6 7 9 9	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex? MR. RHEINHART: Objection to the form. It assumes she knows anything at all about Ghislaine Maxwell and asks her to assume that she does, and therefore it is compound and
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5 6 7 8 9 10 11 12 13 14 15 16 17 18	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: On the instruction of my lawyer, I invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. What is your understanding of Mr. Epstein's involvement with the modeling industry? MR. RHEINHART: Standing objection, and instruct the witness not to answer based on Fifth Amendment, on that basis. THE WITNESS: Upon the instruction of my	4 5 6 7 9 10 11 12 13 14 15 16	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex? MR. RHEINHART: Objection to the form. It assumes she knows anything at all about Ghislaine Maxwell and asks her to assume that she does, and therefore it is compound and ambiguous, and I would instruct her not to answer. THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege. MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10.
5 6 7 8 9 10 11 12 13 14 15 16 17 18	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: On the instruction of my lawyer, I invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. What is your understanding of Mr. Epstein's involvement with the modeling industry? MR. RHEINHART: Standing objection, and instruct the witness not to answer based on Fifth Amendment, on that basis. THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment	4 5 6 7 9 10 11 12 13 14 15 16 17 18	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex? MR. RHEINHART: Objection to the form. It assumes she knows anything at all about Ghislaine Maxwell and asks her to assume that she does, and therefore it is compound and ambiguous, and I would instruct her not to answer. THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege. MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10. (Plaintiff's Exhibit No. 10 was marked for
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	professional model, what company did you work for? MR. RHEINHART: Instruct the witness not to answer based on the Fifth Amendment privilege. THE WITNESS: On the instruction of my lawyer, I invoke my Fifth Amendment privilege. BY MR. KUVIN: Q. What is your understanding of Mr. Epstein's involvement with the modeling industry? MR. RHEINHART: Standing objection, and instruct the witness not to answer based on Fifth Amendment, on that basis. THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege. BY MR. KUVIN:	4 5 6 7 9 10 11 12 13 14 15 16 17 18 19 20 21	BY MR. KUVIN: Q. Would you agree with me that Ghislaine Maxwell provides underage girls to Mr. Epstein for sex? MR. RHEINHART: Objection to the form. It assumes she knows anything at all about Ghislaine Maxwell and asks her to assume that she does, and therefore it is compound and ambiguous, and I would instruct her not to answer. THE WITNESS: Upon the instruction of my lawyer, I must invoke my Fifth Amendment privilege. MR. KUVIN: That's a good point. Take a look at what we'll mark as Exhibit 10. (Plaintiff's Exhibit No. 10 was marked for identification.) MR. KUVIN: All me to show it to the

25 (Pages 97 to 100)

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	Page 445		Page 44
1	reasonably designed to lead to discoverable	1	deposition or you may waive reading and allow th
2	evidence.	2	court reporter to simply type it up and distribute
3	BY MS. EZELL:	3	it to the lawyers who order it.
4	Q. Did you facilitate these acts as well as	4	Do you choose to read or waive?
5	assisting Mr. Epstein in avoiding police detection?	5	THE WITNESS: Waive.
ó	MR, REINHART: Same instruction.	6	MS_EZELL: Thank you.
7	BY MS. EZELL:	7	MR. REINHART: Thank you.
8	Q. Do you know when and by whom the computers	8	THE VIDEOGRAPHER: Okay, this conclude
9	were removed from the El Brillo mansion?	9	today's videotape deposition of Sarah Kellen. The
10	MR. REINHART: Objection to the form, lack of	10	tune is 18:51.
1. 1.	foundation, and it also assumes knowledge of a	11	(Witness excused.)
1.2	place known as the El Brillo mansion. So instruct	12	(Deposition was concluded.)
13	the witness not to answer the question based on the	13	
14	Fifth Amendment.	14	
15	THE WITNESS: At the instruction of my lawyer,	15	
16	I must invoke my Fifth Amendment right.	16	
17	BY MS. EZELL:	17	
19	Q. Was Jane No. 103 invited to just come and hang	18	
19	out at the El Brillo mansion?	19	
20	MR. REINHART: Objection to the form, same as	20	
21	the previous question. It assumes knowledge of a	21	
22	place known as the El Brillo mansion and a person	22	
23	by the name of Jane No. 103. It is compound and	23	
24	lacking in foundation.	24	
25	THE WITNESS: at the instruction of my lawyer,	25	
er opte , par ,	Page 446		Page 441
Ţ.,	I must invoke my Fifth Amendment right.	1	CERTIFICATE
2	BY MS. EZELL:	2	THE STATE OF FLORIDA
3	Q. Have you called any girls under the age of 18	3	COUNTY OF PALM BEACH
4	in Palm Beach or West Palm Beach in the last six years?	5	I, Rachel W. Bridge, Registered Professional
5	MR. REINHART: For any purpose?		Reporter, Florida Professional Reporter and Notary
6	MS EZELL: Yes	б	Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report
7	THE WITNESS: Can you repeat the question?	7	said deposition in stenorype, and that the foregoing
8	BY MS. EZELL:	100	pages are a true and correct transcription of my
9		8	shorthand notes of said deposition. I further certify that said deposition was
10	Q. Have you called any girls under the age of 18		taken at the time and place hereinabove set forth and
2 30	in Palm Beach or West Palm Beach in the last six years?	10	that the taking of said deposition was commenced and completed as hereinabove set out.
4 1	ASD DEIMILADITA V		COMPACION AS INCOMMENTED SET OUT
11	MR. REINHART: You can answer that yes or no,	11	
1.2	if you know.		I further certify that I am not attorney or
12	if you know. THE WITNESS: I don't think so.	11 12	I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or
12 13 14	if you know. THE WITNESS: I don't think so. MS, EZELL: I don't have any other questions.		I further certify that I am not attorney or
12 13 14 15	if you know. THE WITNESS: I don't think so. MS. EZELL: I don't have any other questions. Thank you.	12 13	I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected
12 13 14 15 16	if you know. THE WITNESS: I don't think so. MS. EZELL: I don't have any other questions. Thank you. THE VIDEOGRAPHER: All set?	12	I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.
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