

Green

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2 A. I believe it had a superintendent.
3 Q. What was his name?
4 A. I don't recall.
5 Q. Who hired him?
6 A. I don't recall.
7 Q. When was the company founded?
8 A. I don't recall the specific date.
9 Q. Approximately.
10 A. I don't recall.
11 Q. Well, was it founded after 1995 or
12 before 1995?
13 A. I don't recall specifically.
14 Q. Was it in business for more than ten
15 years?
16 A. No.
17 Q. During the time that it was in
18 business how many employees did it have?
19 A. One.
20 Q. Who was that employee?
21 A. The superintendent.
22 Q. Was there a managing agent
23 responsible for the property 408-412 West
24 129th Street in the year 2000?
25 MS. BRYER: I would ask that

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MS. BRYER: Sir, do you have any control over your client?

MR. MURRAY: I have total control.

MS. BRYER: I will request court supervision. Your client is here to answer questions.

He's now getting up and leaving, your client.

A. For the record, I'm not leaving.

MS. BRYER: The client is not supposed to be having conversations outside of the questions. If he wants to have a conversation with you, his attorney --

MR. MURRAY: We'll go off the record.

MS. BRYER: -- he can have that conversation off the record, but not while there's a question pending.

Excuse me, please.

(Brief recess taken.)

MR. MURRAY: I would like the

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year 2000.

MR. MURRAY: Are you fishing for other situations that are similar to what occurred in this case?

MS. BRYER: No, I'm not fishing, sir. I'm asking appropriate questions under Jacqueline S.

Are you directing your client not to answer?

MR. MURRAY: The answer is yes.

MS. BRYER: Mark that for a ruling.

Q. When did you obtain an ownership interest in 408-412 West 129th Street?

A. I don't recall.

Q. Do you have any papers that would indicate when you obtained that ownership interest?

A. I'm not certain.

Q. If you had those papers, where would they be?

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1 indicate when the LLC was formed?

2 A. I'm not certain if I still have any
3 of those documents.

4 Q. Did your attorney sitting next to
5 you, Mr. Murray, handle that for you?

6 A. I do not believe so.

7 Q. Is the LLC still in existence?

8 A. I do not believe so.

9 Q. Is that a yes or a no?

10 A. I don't recall.

11 Q. You don't recall?

12 Who would know?

13 A. I don't recall.

14 Q. Who else was involved in the running
15 of the LLC?

16 A. No one else.

17 Q. How long was the LLC in existence?

18 A. I don't recall specifically.

19 Q. Approximately.

20 A. Less than five years.

21 Q. Less than five years from when?

22 A. From its inception.

23 Q. Is the LLC still in business?

24 A. I answered that. I don't recall. I
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 2 A. Yes.
 3 Q. Who was her employer?
 4 A. Green Realty Management Corp.
 5 Q. Green ---
 6 A. Green Realty Management.
 7 Q. What affiliation, if any, do you
 8 have with Green Management Realty Corp.?
 9 MR. MURRAY: Are you referring
 10 to the Corp.?
 11 MS. BRYER: I'm referring to
 12 whatever entity this witness has
 13 testified to.
 14 MR. MURRAY: Then it's Corp.
 15 A. I'd have to check my records.
 16 Q. What records would you be checking?
 17 A. Whatever records I ever relative to
 18 the entity.
 19 Q. Who else was employed by Green
 20 Realty Management Corp. in 1998?
 21 A. I don't recall.
 22 Q. How many employees were there?
 23 A. I don't recall.
 24 Q. Who would know?
 25 A. I'd have to check records, if

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relating to this suit and provided to the plaintiff. None of them go back to 1998 because it was agreed by all counsel that that was not a relevant period to go back to. We would deal with a year prior to the incident and that's it.

MS. BRYER: Absolutely not. This witness has unfortunately severe memory lapses. So, in order that this be a meaningful deposition I will be needing these documents to refresh this witness' recollection of the incidents affecting this case.

MR. MURRAY: This case involves an incident that occurred on January 25, 2001 in one of the two buildings. We are not going to go back and produce records beyond what we have produced in accordance with your discovery request, which we have fully complied with.

MS. BRYER: Are you finished?

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