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A. You're looking red, Mr. Rivera-Soto. Are you
okay?
MR. RIVERA-SOTO: I just -- I react to
lies poorly.

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1 **MR. SCHLAFLY:** Object to that.

2 **THE WITNESS:** I was concerned, because
3 if you're red --

4 **MR. RIVERA-SOTO:** I react to perjury
5 very poorly.

6 **THE WITNESS:** If you're red --

7 **MR. SCHLAFLY:** Object. That's
8 completely inappropriate.

9 **MR. RIVERA-SOTO:** Very, very poorly.

10 **MR. SCHLAFLY:** Completely inappropriate.

11 **THE WITNESS:** I was concerned, that's
12 all.

13 **MR. SCHLAFLY:** The conduct of Mr.
14 Rivera --

15 **MR. RIVERA-SOTO:** I have a physical
16 reaction to perjury.

17 **MR. SCHLAFLY:** Okay. Let the record
18 reflect that Mr. Rivera-Soto's conduct throughout
19 this deposition has been inappropriate in that
20 manner. He's laughing to himself, name calling,
21 derogatory.

22 **MR. RIVERA-SOTO:** And if Mr. Schlafly is
23 the standard for behavior, then I'm happy to be
24 inappropriate.

25 **MR. SCHLAFLY:** Completely inappropriate.

1 MR. RIVERA-SOTO: Let the record reflect
2 that this witness --

3 MR. SCHLAFLY: Name calling with the
4 witness.

5 MR. RIVERA-SOTO: -- has been sitting
6 here lying through his teeth the entire day. He
7 hasn't said one honest thing today, maybe his name.
8 We're not so sure about that --

9 MR. SCHLAFLY: That's completely
10 inappropriate.

11 MR. RIVERA-SOTO: -- because he refers
12 to himself as Jimmy R --

13 MR. SCHLAFLY: No.

14 MR. RIVERA-SOTO: -- when his name is
15 not Jimmy R. Rushford is his mother's last name.
16 And it's inappropriate to call him by that last name.
17 But we'll just move on.

18 MR. SCHLAFLY: Let the record reflect
19 this is inappropriate behavior --

20 THE WITNESS: You of all people --

21 MR. SCHLAFLY: -- by Mr. Rivera-Soto.

22 THE WITNESS: -- you're Puerto Rican.
23 You know how last names go.

24 MR. RIVERA-SOTO: Absolutely I know.
25 And it's inappropriate to call you Dr. Rushford.

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1 It's appropriate to call you Dr. Salas Rushford.
2 It's appropriate to call you Dr. Salas, just like
3 it's appropriate to call your father Mr. Salas Soler
4 or Mr. Salas, but not Mr. Soler. You know that.

5 **MR. SCHLAFLY:** Mr. Rivera-Soto, you're
6 not a witness.

7 **MR. RIVERA-SOTO:** I know I'm not.

8 **MR. SCHLAFLY:** You're not a witness.
9 Why are you testifying?

10 **MR. RIVERA-SOTO:** Because you asked me.

11 **MR. SCHLAFLY:** You're not the jury
12 either. I didn't ask you.

13 **MR. RIVERA-SOTO:** You asked me. You
14 asked me. And I'm making my record right here --

15 **MR. SCHLAFLY:** You're not the jury.

16 **MR. RIVERA-SOTO:** -- so the world
17 understands.

18 And by the way, so that you know, I've
19 already called Magistrate Judge Waldor's chambers. I
20 told them that we were having difficulties in getting
21 this witness to testify.

22 And I was told that I should call at any
23 time, that they will get Magistrate Judge Waldor on
24 the phone, and she will resolve the problem.

25 So if we want to go there, happy to do

1 it.

2 **MR. SCHLAFLY:** That's fine. You know,
3 when you call the Court like that, you're supposed to
4 have opposing counsel --

5 **MR. RIVERA-SOTO:** No. When I call the
6 Court --

7 **MR. SCHLAFLY:** You're not supposed to ex
8 parte communications with the Court.

9 **MR. RIVERA-SOTO:** My call was just to
10 give a heads-up.

11 **MR. SCHLAFLY:** That's inappropriate.
12 No. It's an ex parte communication and it's
13 inappropriate.

14 **MR. RIVERA-SOTO:** You go right ahead and
15 turn me in.

16 **MR. SCHLAFLY:** You should know --

17 **MR. RIVERA-SOTO:** Go ahead.

18 **MR. SCHLAFLY:** -- that by now. Based on
19 your career --

20 **MR. RIVERA-SOTO:** Don't be ignorant.

21 **MR. SCHLAFLY:** -- you should know what
22 your professionals obligations are.

23 **MR. RIVERA-SOTO:** Don't be ignorant.

24 Let's move on.

25