

Exhibit 2

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1	A.	To my knowledge, yes.	11:38:39
2	Q.	Is there anyone who would have better	11:38:42
3		knowledge?	11:38:45
4	A.	I don't think so.	11:38:47
5		MS. BERMAN: Let's take one more brief	11:39:07
6		break please.	11:39:09
7		(Whereupon, a break was taken from	11:39:10
8		11:39 a.m. to 11:44 a.m.)	11:39:11
9		MS. BERMAN: Let's go back on the record,	11:44:41
10		please.	11:44:54
11		Based on the City's failure to prepare	11:44:57
12		Miss Early to testify as a designee as 30(b)(6)	11:45:01
13		requires, as to the matters called for in the	11:45:07
14		deposition notice, we're going to stop the deposition	11:45:09
15		at this point to allow us to consider whether to seek	11:45:12
16		relief from the Court.	11:45:16
17		MR. SCHWARTZ: What's the basis of your	11:45:17
18		contention that the City hadn't prepared Miss Early	11:45:19
19		to testify about Topic 4 of your notice?	11:45:23
20		MS. BERMAN: Miss Early's testimony seems	11:45:26
21		to be largely based on personal knowledge, rather	11:45:28
22		than preparation as to the full scope of the City's	11:45:31
23		knowledge.	11:45:36
24		MR. SCHWARTZ: About what?	11:45:39
25		MS. BERMAN: Regarding the topics as to	11:45:41

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1	which we requested testimony.	11:45:45
2	MR. SCHWARTZ: All right. Well, you	11:45:48
3	haven't asked Miss Early about her experience, about	11:45:51
4	her duties. You haven't established what she knows	11:45:54
5	and what she doesn't know. This witness is certainly	11:46:00
6	responsive to your Topic Number 4. She is qualified	11:46:04
7	to testify about licenses and leases of space and	11:46:08
8	City-owned property in the overlay district. She has	11:46:16
9	personal experience with them. She knows what they	11:46:20
10	-- what the properties are used for. She knows --	11:46:23
11	she is familiar with the leases and licenses. She is	11:46:29
12	here to testify about them. You just haven't asked	11:46:35
13	her what her personal experience is.	11:46:37
14	MS. BERMAN: I think we're going to have	11:46:40
15	to agree to disagree on that point and stop the	11:46:44
16	deposition at this point.	11:46:48
17	MR. SCHWARTZ: Okay.	11:46:50
18	MS. BERMAN: Thank you for your time.	11:46:50
19	THE WITNESS: Okay.	11:46:51
20	COURT REPORTER: When do you want the	11:46:51
21	transcript?	
22	MS. BERMAN: What is reasonable from	
23	your standpoint?	
24	COURT REPORTER: Tomorrow if you like.	
25	MS. BERMAN: Wonderful. Yes.	