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**FILED**  
 SUPERIOR COURT OF CALIFORNIA  
 COUNTY OF RIVERSIDE

SEP 14 2001

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**K. AMIDEI**

5 Attorneys for DON ROBINSON

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 SEP 18 2001

8 **SUPERIOR COURT OF CALIFORNIA**  
 9 **COUNTY OF RIVERSIDE - INDIO**

11 LYN EULER,  
 12 Plaintiff,  
 13 -vs-  
 14 DON ROBINSON; GUIDE DOGS OF THE  
 DESERT; and DOES 1 through 25, inclusive,  
 15 Defendants.

Case No.: INC 020234  
 [Complaint Filed: November 28, 2000]

**DECLARATION OF JAMES T. JACKSON IN SUPPORT OF PROTECTIVE ORDER**

[Filed and served concurrently with  
 Opposition to motion to compel deposition  
 of Don Robinson; and Proposed Protective  
 Order]

Date : 9/24/01  
 Time : 8:30 a.m.  
 Dept. : 2G

19 I, James T. Jackson, hereby declare as follows:

20 1. I am an attorney at law duly licensed to practice before all courts of the state of  
 21 California, and am a partner in the law firm of Stafford & Jackson, LLP, attorneys of record for  
 22 Defendant DON ROBINSON (hereinafter "ROBINSON"). I have personal knowledge of the facts  
 23 contained herein and if called upon I could and would testify competently thereto.

24 2. This declaration is made in support of ROBINSON's opposition to Plaintiff's motion  
 25 to compel ROBINSON's deposition, and in support to a Protective Order either terminating said  
 26 deposition or limiting it's scope to matters relevant to the discovery of facts regarding the underlying  
 27 issue of alleged sexual harassment.

28 3. On August 1, 2001, I was the attorney defending ROBINSON as his deposition. (A

1 true and correct copy of ROBINSON's deposition transcript is attached hereto as Exhibit "A".)

2 4. During the deposition ROBINSON was subjected to harassing and abusive questions,  
3 necessitating my canceling said deposition to seek a protective order. However, while waiting to  
4 receive a copy of the transcript, Plaintiff brought this motion.

5 5. Plaintiff's counsel harassed and embarrassed ROBINSON with questions regarding  
6 his graduating from continuation high school 35 years ago.

7 6. Plaintiff's counsel harassed and embarrassed ROBINSON with questions regarding  
8 his part time job as a sleigh ride operator during high school 35 years ago.

9 7. Plaintiff's counsel harassed and embarrassed ROBINSON with questions regarding  
10 his military training during the Vietnam War, which again was over 30 years ago.

11 8. I repeatedly requested that Plaintiff's counsel give an offer of proof as to how those  
12 three lines of questioning were relevant to the subject litigation. Plaintiff's counsel refused to give  
13 such an offer of proof.

14 9. None of the three above lines of questioning are relevant to the current litigation  
15 regarding sexual harassment, and are not designed to lead to admissible evidence.

16 10. During Plaintiff's counsel's questioning of ROBINSON regarding ROBINSON's  
17 training in preparation for the Vietnam War, it became apparent to me that ROBINSON was very  
18 uncomfortable discussing his war experience, and ROBINSON asked to stop, so, I went off record.

19 11. As I was walking next to ROBINSON in the hallway, ROBINSON appeared flushed  
20 and was having difficulty breathing. I thought he was having a heart attack.

21 12. Upon reaching the men's room, ROBINSON started sobbing and shaking  
22 uncontrollably. I asked ROBINSON if he was alright and he stated he had not thought about the  
23 events surrounding his military days in a long time.

24 13. ROBINSON further advised me that he lost a lot of friends who went through his  
25 training to guard the sea bees, and particularly upsetting was the question about whether he had  
26 graduated from said training. ROBINSON advised me that you did not graduate, but rather you were  
27 deployed once your buddies before you were killed.

28 14. Due to my concerns for ROBINSON's health, I felt it necessary to cancel

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ROBINSON's deposition.

15. Due to the necessity in terminating ROBINSON's deposition, and particularly my repeated requests that Plaintiff's counsel move on, Plaintiff is not entitled to sanctions.

16. In the hallway, at the conclusion of ROBINSON's deposition, I met with Plaintiff's counsel to discuss limiting the subject matter of ROBINSON's deposition. However, we could not agree on what questions were irrelevant to the litigation.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed this 14<sup>th</sup> day of September, 2001, at Santa Ana, California.

  
James T. Jackson, Declarant

ORIGINAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF RIVERSIDE - INDIO

LYN EULER, )

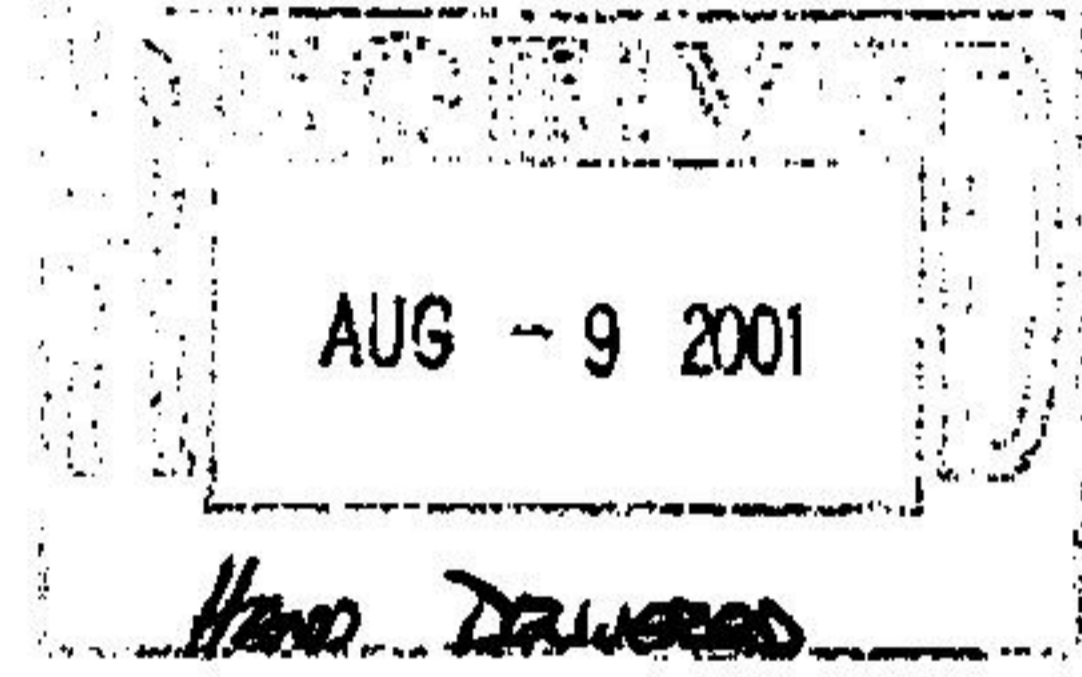
Plaintiff, )

vs. )

Case No. INC 020234

DON ROBINSON; GUIDE DOGS OF )  
THE DESERT; and DOES 1 through )  
10, Inclusive, )

Defendants. )



DEPOSITION OF DON ROBINSON

Date and Time: Wednesday, August 1, 2001  
10:04 a.m. - 10:56 a.m.

Location: 2068 Orange Tree Lane, Suite 250  
Redlands, California

Reporter: Christine Barron, CSR  
Certificate No. 12015

spherion<sup>SM</sup>

MAXENE WEINBERG AGENCY  
DEPOSITION SERVICES  
27281 LAS RAMBLAS, SUITE 160  
MISSION VIEJO, CA 92691  
(800) 648-1949 • FAX (949) 582-8569

NATIONWIDE SERVICES

EXHIBIT A



1 APPEARANCES:

2

For Plaintiff Lyn Euler:

3

4

HOMAN & STONE

BY: CLYDE E. HIRSCHFELD

5

ALSO BY: RHONA S. KAUFFMAN

Attorneys At Law

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909.307.9380

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For Defendant Don Robinson:

10

STAFFORD & JACKSON, L.L.P.

11

BY: JAMES T. JACKSON

Attorney At Law

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Santa Ana, California 92705

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714.835.0132

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15

For Defendant Guide Dogs of the Desert:

16

NILL & JOHNSTON

17

BY: GEORGE B. JOHNSTON, ESQ.

ALSO BY: DANIEL L. HOUGH

18

Attorney At Law

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Lake Forest, California 92630

949.770.2737

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21

For Defendant Guide Dogs of the Desert:

22

23

CIHIGOYENETCHE, GROSSBERG & CLOUSE

BY: RICHARD R. CLOUSE

24

Attorney At Law

3602 Inland Empire Boulevard, Suite C315

25

Ontario, California 91764

909.483.1850

1	Appearances (continued)
2	Also Present:
3	KAREN REYNOLDS
4	PRESIDENT, GUIDE DOGS OF THE DESERT
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INDEX

EXAMINATION BY:

PAGE

Clyde Hirschfeld

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EXHIBITS

(None.)



1 THE VIDEOGRAPHER: The time is 10:04 a.m. This is  
2 Volume I of the videotaped deposition of Don Robinson  
3 taken on August 1st, 2001 in the matter of Linda Euler  
4 versus Don Robinson; Guide Dogs of the Desert; and Does  
5 1 through 10, inclusive. Case No. INC 0230234. This  
6 deposition is taking place at the Law Office of Homan &  
7 Stone located at 2068 Orange Tree Lane, Suite 224  
8 Redlands, California. My name is Nancy Hotaling, the  
9 videographer with Spherion Court Reporters located at  
10 27281 Las Ramblas, Suite 160 Mission Viejo, California.  
11 Would counsel and all those present today please  
12 identify yourself.

13 MR. HIRSCHFELD: Thank you. My name is Clyde  
14 Hirschfeld from Homan & Stone and I'm counsel for  
15 Plaintiff, Lyn Euler.

16 Competent: I'm Rhona Kauffman from Homan & Stone  
17 for Plaintiff, Lyn Euler.

18 MR. HOUGH: Daniel Hough, corporate counsel for  
19 Guide Dogs of the Desert.

20 MR. JOHNSTON: George Johnston representing Guide  
21 Dogs of the Desert.

22 MR. CLOUSE: Richard Clouse for Guide Dogs of the  
23 Desert.

24 MR. JACKSON: James Jackson on behalf of the  
25 Deponent, Don Robinson. Also present is the plaintiff,

1 Linda Euler, and the president of Guide Dogs of the  
2 Desert, Karen Reynolds.

3 THE VIDEOGRAPHER: Swear in the witness, please.

4 DON ROBINSON,

5 having been first duly sworn, was examined and  
6 testified as follows:

7 EXAMINATION

8 BY MR. HIRSCHFELD:

9 Q Mr. Robinson, as I said a minute ago my name  
10 is Clyde Hirschfeld and I'm here representing Linda  
11 Euler. You are here pursuant to Notice of Deposition.  
12 It was a continued deposition, and I'd like to go  
13 through today before we get started some of the ground  
14 rules that take place in the deposition. I know that  
15 you've sat through several in this case, haven't you?

16 A Yes, I have.

17 Q Nevertheless, I'm going go through them with  
18 you.

19 A Okay.

20 Q The first question I'm going to ask is: Have  
21 you ever had your deposition taken before?

22 A Not that I recall.

23 Q Now, you realize that you've been placed  
24 under oath here today, don't you?

25 A Yes.

1 Q And do you know what the oath is that you  
2 took?

3 A Yes.

4 Q That's a promise that you're going to tell  
5 the truth; correct?

6 A Yes.

7 Q And despite the informal setting that we're  
8 taking this deposition in, you realize that that oath  
9 has the same meaning as it would if you took it in a  
10 court of law?

11 A Yes.

12 Q Everything that you say here today is being  
13 taken down by the Court Reporter and also by the  
14 videographer that we have. The Court Reporter will be  
15 preparing a booklet of everything that is said here and  
16 it will be in question and answer form. Do you  
17 understand that?

18 A Yes.

19 Q Have you ever seen one of those before?

20 A Yes, I have.

21 Q You're going to have an opportunity to look  
22 at that question and answer booklet and make any  
23 changes that you need to. I want to comment though  
24 right now that if you make any substantive changes to  
25 that, any attorney will have the opportunity to make

1 comment upon those changes at a courtroom. Do you  
2 understand that?

3 A Yes, I do.

4 Q It's important that you give your best  
5 testimony here. I want you to carefully reflect upon  
6 the question I ask or others ask before you give your  
7 answer. I'm also going to ask you to wait a moment  
8 before you give your answer to give any attorney in  
9 this room an opportunity to object to the question. Do  
10 you understand that?

11 A Yes, I do.

12 Q The Court Reporter can only take down one  
13 person's comments at a time so I'd ask that you wait  
14 until I complete my question until you start your  
15 answer. Will you do that for me?

16 A Yes, I will.

17 Q Now, the other thing that we need to go  
18 through, and sometimes we have a problem with this and  
19 I want to go through it with you, is we don't want you  
20 to make any guesses, but we are entitled to estimates.  
21 Do you understand the difference between a guess and an  
22 estimate?

23 A Yes, I do.

24 Q For the record I'm going to go through just  
25 an example that's usually given. If I asked you to

1 estimate the length of this table you could do so,  
2 could you not?

3 A Yes, I could.

4 Q If you asked you to estimate the length of  
5 the table in my house, however, my dining room table,  
6 you probably couldn't. Do you understand that?

7 A Yes.

8 Q Now, are you under any medications today?

9 A No.

10 Q If you need to speak to your attorney at any  
11 time, because we have a videographer present I would  
12 ask that you comment, we'll go off the record so that  
13 the communication will not be put onto tape. Do you  
14 understand that?

15 A Yes.

16 Q If you need to take a break for any reason,  
17 let me know and we'll go off the record. This isn't  
18 designed to be a marathon session. Do you understand  
19 that?

20 A Yes, I do.

21 Q Now, there are occasionally questions that  
22 might be asked and objections that might be made by  
23 counsel in this room. Do you understand that you still  
24 have an obligation to answer those questions even  
25 though objections are made?

1           A     Yes, I do.

2           Q     Do you have any questions before we start?

3           A     No.

4           Q     Okay. We're going to start, obviously, with  
5 some background information so I'd like to go back to  
6 your educational background first. Did you graduate  
7 from high school?

8           A     Yes.

9           Q     What high school did you graduate from?

10          A     Continuation high school.

11          Q     Where was that school located?

12          A     Spokane, Washington.

13          Q     When you say "continuation high school," was  
14 this a school for people who had dropped out of high  
15 school?

16          A     No.

17          Q     Okay. Was this the only high school that you  
18 ever attended?

19          A     No.

20          Q     What was your first high school?

21          A     Shadle Park High School.

22          Q     Could you spell that for us?

23          A     S-h-a-d-l-e, in Spokane.

24          Q     How many years did you attend that school?

25          A     One year.

1 Q What did you do after that year? Did you  
2 continue with high school?

3 A Yes.

4 Q Where did you go?

5 A We moved. I went to Joel E. Ferriss.

6 Q Could you spell those for me?

7 A Joel, J-o-e-l, E., Ferriss F-e-r-r-i-s-s.

8 Q Where is that school located?

9 A Spokane.

10 Q How long did you attend school there?

11 A Just shy of three years.

12 Q Was there any interruption in time between  
13 Shadle and Ferriss?

14 A Shadle and Ferriss, no, it was just standard  
15 summer breaks. We just didn't move.

16 Q Now, after your being just shy of three years  
17 at Ferriss you obviously did not graduate from that  
18 school; correct?

19 A Right.

20 Q What happened?

21 A I was having trouble with attendance so they  
22 sent me to continuation high school. I was working two  
23 jobs and having trouble with attendance. I left home  
24 when I was 16.

25 Q Now, was continuation high school a night

1 school?

2 A No, a day school.

3 Q Did it require you to go to classes every  
4 day?

5 A Yes.

6 Q Was it your choice go to continuation high  
7 school?

8 A No.

9 Q Were you expelled from Ferriss?

10 A I don't recall how I ended up at  
11 continuation. If I was expelled or what. I just don't  
12 recall.

13 Q In any case, the district transferred you to  
14 continuation high school?

15 A Yes.

16 Q Did you immediately go to continuation high  
17 school upon stopping at Ferriss?

18 A Yes.

19 Q Now, when did you leave Ferriss High School,  
20 month and day?

21 A I have no idea.

22 Q Did you immediately go to continuation high  
23 school from Ferriss?

24 A Yes, like I said.

25 Q When did you -- did you graduate from



1 continuation high school?

2 A Yes.

3 Q When did you graduate?

4 A June of '67, I believe.

5 Q And when did you start high school at Shadle?

6 A Well, whenever I got out of middle school I  
7 started high school. I guess you go backwards four  
8 years, '62, '63.

9 MR. JACKSON: If you don't remember the day --

10 THE WITNESS: I don't. I could do the math, I  
11 guess.

12 BY MR. HIRSCHFELD:

13 Q Was it a straight four years? Four-year  
14 program?

15 A Of high school?

16 Q Of high school.

17 MR. JACKSON: Well, it's certainly not necessary  
18 to make relevancy objections, I'll make it anyway.  
19 Talking about high school. We've spent 15 minutes on  
20 high school. I think it's a little abusive and  
21 overbroad at this point in time, but I'll give you a  
22 little more leeway.

23 MR. HIRSCHFELD: Why thank you, Counsel.

24 BY MR. HIRSCHFELD:

25 Q Now, with regard to continuation school, you

1 said that it was based on attendance. Were there any  
2 other reasons why you were sent over to continuation  
3 high school?

4 A No.

5 Q You said that during the period of time that  
6 you were at continuation high school were you working  
7 jobs?

8 A Two jobs.

9 Q What jobs were they?

10 A I worked at Playfair Race Track and Pomonus  
11 Riding Stables.

12 Q Can you give us the jobs that you held at  
13 those positions, those companies?

14 A Playfair Race Track?

15 Q Yes.

16 A I don't think you're going to believe me. I  
17 was a jockey. You just rode it under Pomonus Riding  
18 Stables, but I was a jockey at Playfair Race Track.

19 Q At the riding stables?

20 A Just the maintenance and helped with the  
21 horses. I had nine horses there of my own.

22 Q Were you the owner of the nine horses?

23 A Yes, I had hay ride and sleigh ride teams  
24 that I worked on the weekend.

25 MR. JACKSON: Can we go off the record for a

1 minute?

2 MR. HIRSCHFELD: Sure.

3 THE VIDEOGRAPHER: The time is 10:15 a.m. We're  
4 off the record.

5 (Recess taken.)

6 THE VIDEOGRAPHER: Time is 10:18 a.m. We're on  
7 the record.

8 BY MR. HIRSCHFELD:

9 Q You indicated that you went to continuation  
10 high school. Did it have any other name?

11 A I don't recall.

12 Q So that was the formal name of the school was  
13 continuation high school?

14 A Well, I don't recall.

15 Q You indicated before we went off the record  
16 that you owned nine horses; is that correct?

17 A Yes.

18 Q Did you run a business?

19 A Yes.

20 Q What was the name of that business?

21 A It was part of the riding stable.

22 Q Did you have an interest in the riding stable  
23 itself?

24 A No.

25 Q So as an adjunct to the riding stable they

1 had -- you owned horses and you had a separate  
2 business?

3 A Yes.

4 Q Could you describe the nature of that  
5 business, please?

6 A It was hay rides and sleigh rides for church  
7 groups on weekends.

8 Q Were you the only owner of that business?

9 A Yes, I was.

10 Q And when did you start that business?

11 A I don't recall.

12 MR. JACKSON: May I try to establish a time line  
13 here just --

14 MR. HIRSCHFELD: I will go back and ask the  
15 question.

16 BY MR. HIRSCHFELD:

17 Q You established this business while you were  
18 in high school?

19 A Yes.

20 Q Do you recall whether you were still at  
21 Ferriss High School when you started this business?

22 MR. JACKSON: That's not the time line I was  
23 referring to. How old are you, Mr. Robinson?

24 THE WITNESS: I'm 53.

25 MR. JACKSON: And do you know how old you were

1 when you graduated from high school?

2 THE WITNESS: 19.

3 MR. JACKSON: So we're talking 24 years ago -- 34  
4 years ago.

5 THE WITNESS: 34, yes.

6 MR. JACKSON: I just wanted to establish that.

7 BY MR. HIRSCHFELD:

8 Q Do you know how old you were when you opened  
9 this business? Yes or no?

10 A No.

11 Q Do you know whether or not you were at  
12 Ferriss High School when you opened the business?

13 A Yes.

14 Q Were you?

15 A Yes.

16 Q Do you recall which grade you were in?

17 A No.

18 Q How long did you have this business?

19 A I don't recall.

20 Q Was the business -- did you have the business  
21 when you finished continuation high school?

22 A I don't recall.

23 Q Do you recall the circumstances when you left  
24 the business or sold it?

25 A Yes.

1 Q What were the circumstances?

2 A I had a disagreement with the owner.

3 Q The owner of the riding stable?

4 A Yes.

5 Q What was the nature of that disagreement?

6 MR. JACKSON: Objection, relevancy, scope and  
7 time.

8 MR. HIRSCHFELD: You may answer.

9 THE WITNESS: I don't recall.

10 BY MR. HIRSCHFELD:

11 Q Now, after leaving continuation high school  
12 do you recall what you did next in your life?

13 A Went into the Navy.

14 Q Was that upon graduation or was there a  
15 period of time between high school and your entering  
16 the Navy?

17 A There was a short period of time before I  
18 went in.

19 Q Do you recall how long a period of time?

20 MS. BROCK: I'm Carolyn Brock. Sorry I'm late.

21 MR. HIRSCHFELD: Let's -- okay. Thank you.

22 MR. JACKSON: I'm sorry, who are you?

23 MS. BROCK: Carolyn Brock.

24 MR. JACKSON: And you are --

25 MS. BROCK: With Howard L. Sanger's office.

1 MR. JACKSON: We need to go off the record.

2 MR. HIRSCHFELD: Let's go off the record.

3 THE VIDEOGRAPHER: The time is 10:23 a.m. We're  
4 off the record.

5 (Recess taken.)

6 THE VIDEOGRAPHER: Time is 10:32 a.m. We're on  
7 the record.

8 (Recess taken.)

9 MR. HIRSCHFELD: We should note that while we were  
10 off the record an objection was made to the presence of  
11 one of the individuals who had entered the room. That  
12 person has now left and we will go ahead and continue  
13 with the deposition.

14 I will note for the record, however, that as  
15 everyone in this room is aware, it has been the common  
16 practice in all of the depositions that have taken  
17 place for a number of parties to be sitting in, but  
18 Counsel has made his objection. We don't believe it's  
19 appropriate at this time to shut down this deposition  
20 to go ahead and go to court in regard to this issue and  
21 we'll go ahead and proceed.

22 BY MR. HIRSCHFELD:

23 Q Now, you indicated that there was a short  
24 period of time after you left high school before you  
25 entered the Navy. How short a period of time?

1 A I believe it was four to five months.

2 Q Do you recall what you did during that four  
3 or five months?

4 MR. JACKSON: 34 years ago?

5 MR. HIRSCHFELD: Yes, Counsel, 34 years ago.  
6 Thank you for reminding me.

7 THE WITNESS: No, I don't.

8 BY MR. HIRSCHFELD:

9 Q Do you recall whether you held any jobs  
10 during that period of time?

11 A I don't recall what I was doing.

12 Q Now, you said you went into the Navy. Did  
13 you go into any special division of the Navy?

14 A I'm afraid I don't understand what you mean.

15 Q Okay. We'll, go into this. You joined the  
16 Navy.

17 A Yes.

18 Q What was your military occupational specialty  
19 when you went in?

20 A I was in the reserves while I was in high  
21 school and I was going for --

22 MR. JACKSON: Objection, nonresponsive. He asked  
23 you about your specialty when you entered the Navy.

24 THE WITNESS: That's what I'm trying to remember.

25 MR. JACKSON: If you can't remember that's fine.



1 THE WITNESS: I don't remember the name they call  
2 it. Electronics specialty, but I don't remember the  
3 name of the specialty. That's the problem I'm having.

4 BY MR. HIRSCHFELD:

5 Q Did you enter as an unlisted man? Did you  
6 entered as an unlisted man?

7 A I don't know what that means.

8 Q Well, there are unlisted men and there are  
9 officers. Were you an unlisted man or an officer?

10 A Unlisted man, okay.

11 Q Did you undergo any training when you were in  
12 the service?

13 A Yes.

14 Q And you've indicated that your MOS was  
15 related to electronics. Was your training related to  
16 electronics also?

17 A No.

18 Q What was your training related to?

19 A You're going to have to break it down to  
20 periods of time. That's --

21 Q When you first entered the Navy, what  
22 training did you receive?

23 A I went to electronics school.

24 Q What was your understanding of what you would  
25 do when you finished this electronics school?

1 A On electronic equipment and Navy bases or  
2 ships.

3 Q Would this be repair of electronic equipment?

4 A Yes.

5 Q Do you know whether you were an AE in the --  
6 excuse me. Never mind. Now, after you completed that  
7 school did you, in fact, start repairing electronic  
8 equipment?

9 A Didn't complete the school.

10 Q Was there a reason why you didn't complete  
11 the school?

12 A Yes.

13 Q What was the reason?

14 A Color blind.

15 Q Was that the sole reason why you didn't  
16 complete the school?

17 A Sole reason.

18 Q What did you do when you left the school?

19 A I believe they sent me to Treasure Island.

20 Q That's up in San Francisco area?

21 A San Francisco.

22 Q Why did they send you to Treasure Island?

23 MR. JACKSON: Objection, calls for speculation.

24 BY MR. HIRSCHFELD:

25 Q What did you do when you were at Treasure



1 Q On the orders that attached you to the CB's  
2 were you being attached as to temporarily to the CB's  
3 or were assigned to the CB's?

4 A Assigned.

5 Q Did you undergo training with the CB  
6 battalion's?

7 A Yes.

8 Q What training did you undergo?

9 A It was a specialty training.

10 Q What type of specialty training?

11 A Recon, reconnaissance, night fire, military  
12 weapons, hand-to-hand combat, gorilla warfare, seal  
13 training. That's all I can recall.

14 Q Was the training that you received standard  
15 for everyone who joined?

16 MR. JACKSON: Objection, calls for speculation,  
17 vague and ambiguous as to "standard."

18 MR. HIRSCHFELD: You can go ahead and answer.

19 MR. JACKSON: If you know what he means.

20 THE WITNESS: No.

21 BY MR. HIRSCHFELD:

22 Q Reconnaissance training that you went  
23 through, did all individuals who joined the CB to the  
24 best of your knowledge go through the reconnaissance  
25 training?

1           A     No.

2           Q     The night fire exercises, did all CB's --

3           A     No.

4           Q     -- to the best of your knowledge -- excuse

5     me. Let me finish the sentence -- go through that

6     training?

7           A     No.

8           Q     You say you were -- did you ever receive any

9     construction training while you were at the CB's?

10          A     No.

11          Q     Do you know whether you were considered a CB?

12          A     Yes.

13          Q     The military weapon training that you had,

14     was it the same that every other CB received, to the

15     best of your knowledge?

16          A     No.

17          Q     Hand-to-hand was the same or not?

18          A     No.

19          Q     The gorilla training?

20          A     No.

21          Q     And the seal training?

22          A     No.

23          Q     Were you placed in a special group of

24     individuals within the CB's?

25          A     Yes.

1 Q What was the name of that group?

2 A I don't recall.

3 Q You said that you received seal training.

4 Where did you receive your seal training?

5 A They sent us to a base, another base. I

6 don't remember which base it was.

7 Q Do you know what state it was in?

8 A California.

9 Q Do you know if it was Southern California or

10 Northern California?

11 A I don't recall.

12 Q Do you remember how long that course was?

13 A No, I don't.

14 Q Do you understand what the word "seal" means?

15 MR. JACKSON: Objection. In what context?

16 MR. HIRSCHFELD: Seal in the context of a naval

17 unit.

18 THE WITNESS: I don't remember.

19 BY MR. HIRSCHFELD:

20 Q Is the seal training that you went through,

21 did you become a quote "seal"?

22 A No.

23 Q So the training that you had that was seal

24 training was not the same that a quote "seal" would

25 receive?