

EXHIBIT 20



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Transcript of Charles Leander Walen

Date: December 7, 2022

Case: Walen, et al. -v- Burgum, et al.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

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CHARLES WALEN, an individual; :
and PAUL HENDERSON, an :
individual, :
Plaintiffs, :
v. : Case No.

DOUG BURGUM, in his official : 1:22-CV-00031-CRH
capacity as Governor of the :
State of North Dakota; and :
ALVIN JAEGER, in his official :
capacity as Secretary of :
State of North Dakota, :
Defendants, :

- - - - - x

(Caption continued on next page)

Deposition of CHARLES LEANDER WALEN
Conducted Virtually
Wednesday, December 7, 2022
2:02 p.m. EST

Job No.: 473885
Pages 1 - 37
Reported by: Debra A. Whitehead

Transcript of Charles Leander Walen
December 7, 2022

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1 (Caption continued from previous page)

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3 and :

4 MANDAN, HIDATSA AND ARIKARA :

5 NATION, CESAR ALVAREZ, and :

6 LISA DEVILLE, :

7 Intervenor-Defendants. :

8 - - - - - X

9 Deposition of CHARLES LEANDER WALEN, conducted
10 virtually.

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13 Pursuant to notice, before Debra Ann Whitehead,
14 E-Notary Public in and for the State of Maryland.

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Transcript of Charles Leander Walen
December 7, 2022

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C O N T E N T S

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E X H I B I T S

(none)

1 P R O C E E D I N G S

2 CHARLES LEANDER WALEN,

3 having been duly sworn, testified as follows:

4 EXAMINATION BY COUNSEL FOR

5 INTERVENOR-DEFENDANTS

6 BY MR. GABER:

7 Q Mr. Walen, my name is Mark Gaber. I'm a
8 lawyer for the intervenor-defendants in this case,
9 and I will be asking you some questions.

10 I'll start, can you state your name, for
11 the record.

12 A Charles Walen.

13 Q And have you been deposed before?

14 A Yes.

15 Q How many times?

16 A One time that I can remember, and it was
17 for a work-related reason.

18 Q About how long ago was that?

19 A Fifteen-plus years ago.

20 Q All right. So I'll spend just a couple
21 of minutes here with some ground rules since it's
22 been a while since you've done this. The main one
23 is to be cognizant that we have a court reporter
24 who is taking down all of our words. So that
25 makes it important that we endeavor to talk slowly

1 and that we not talk over each other. That, you
2 know, can be awkward sometimes because that's not
3 how one has a normal conversation. But for her
4 benefit please keep that in mind, and I'll also do
5 my best not to talk over you when you're giving an
6 answer.

7 Does that make sense?

8 A Yes, that does.

9 Q And then another is that you have to give
10 verbal responses to my questions. She can't take
11 down, you know, head nods and the like. And since
12 we're doing this remotely, that's even harder, I
13 imagine, than it might be if we were in the same
14 room with one another. So do try, though again at
15 times it can be awkward to give a verbal response
16 to each question. Okay?

17 A Understand.

18 Q I will assume that you understand my
19 questions unless you say something. So, you know,
20 if I ask you a question and you don't understand
21 it or I do a poor job of asking it, please just
22 let me know, and I will clarify so that we are
23 both on the same page.

24 Okay?

25 A I will do so.

1 Q I don't anticipate us taking much of your
2 time today. But if we do need a break or if you
3 need a break, please let me know, and we can go
4 ahead and take one. The only thing that I ask is
5 if that's the case, that you answer any question
6 that is pending, and then we can go ahead and take
7 a break.

8 Does that sound good?

9 A That sounds good. And I am at work, so
10 just bear that in mind.

11 Q Okay.

12 A I'm in a private office.

13 Q All right. Well, I'll try not to keep
14 you too long from your job.

15 Someone, one of the other attorneys might
16 object to a question that I ask. If they do, you
17 know, let them state that objection, but then you
18 can go ahead and answer my question.

19 Does that make sense?

20 A Yes.

21 Q And is there any reason that you can't
22 answer my questions today truthfully and fully?

23 A No.

24 Q Now, you mentioned you're at your office.
25 Is there anyone else in the room there

1 with you?

2 A No.

3 Q And did you bring any notes with you
4 today?

5 A Yes.

6 Q What's the nature of those notes?

7 A They were from the deposition this
8 morning with Paul. I just took some notes then so
9 that any questions that might be similar, I'll
10 have the answer.

11 Q Well, I would -- it's probably best if --
12 I know you were present this morning. You know, I
13 don't know, maybe I'll direct this to your
14 counsel. Typically if someone has notes, you
15 know, we are entitled to see those. I don't know
16 if you would rather he not have those notes or if
17 you're fine producing them.

18 THE WITNESS: The only thing that's on
19 the notes are names and dates.

20 MR. GABER: So then it sounds like you
21 may be fine producing them.

22 I don't know, Paul, if you have a
23 preference.

24 MR. SANDERSON: I don't -- doesn't
25 matter. You can make a request. Shouldn't be a

1 problem.

2 MR. GABER: Okay. That sounds good.

3 Q And, Mr. Walen, other than the Zoom
4 screen that's open, are there any other screens,
5 e-mail, anything like that, that are open on your
6 computer?

7 A My company e-mail is open because I
8 cannot -- I'm not supposed to close it.

9 Q That's fine with me. I just ask that you
10 not, like, e-mail someone to get answers to
11 questions during the deposition. But I don't want
12 to get you in trouble with your job.

13 What did you do to prepare for today's
14 deposition?

15 A I read through the interrogatories that I
16 had before, and then I watched the deposition this
17 morning.

18 Q Did you meet with your counsel before
19 today's deposition?

20 A By phone only.

21 Q And when was that?

22 A Yesterday and today.

23 Q Did you meet with your counsel after this
24 morning's deposition?

25 A For one question only.

1 Q And I don't want to know what the
2 question and answer were.

3 Did you review any documents in
4 preparation for the deposition?

5 A Yes.

6 Q And when were those documents?

7 A I -- as because of this morning's
8 deposition I looked at my e-mail and my text
9 messages so that I could answer that question.

10 Q And can you just be a little bit more
11 specific. What in particular were you looking
12 for?

13 A To see if I had anything in those areas
14 that pertained to this case.

15 Q And what did you do to make that
16 determination? Did you run a search, or what was
17 your process?

18 A I did a -- just I did a search based on
19 lawsuit and I did a search based on redistricting.

20 Q And that was in your personal e-mail?

21 A Correct.

22 Q What's that e-mail address?

23 A ChuckWalen@Gmail.com.

24 Q And did you find documents?

25 A The only documents that are in there are

1 between my attorney and myself.

2 Q And what about with respect to your text
3 messages?

4 A There was only one outside of the
5 attorney.

6 Q And what was that text message?

7 A Paraphrasing, it said, I understand that
8 you're -- that we redistricted, there may be a
9 lawsuit, I'm willing to help.

10 Q Who was that communication with?

11 A Jay Sandstrom.

12 Q Jay Sandstrom?

13 A Yes.

14 Q And who is he?

15 A He is a member of our district.

16 Q Did you say a member of your district?

17 A Yes. Or constituent of our district.

18 Q You reached out to him?

19 A No; he reached out to me.

20 Q When you say a constituent of your
21 district, is he like -- is he affiliated with the
22 Republican party, or is he -- what's his role?

23 A He is a member of the Republican party.

24 Q Does he hold any official position with
25 the party?

1 A No.

2 Q When was that text message? Or when was
3 that text exchange?

4 A I don't know the date. I'd have to look
5 back at the records.

6 Q Okay.

7 A It was after the redistricting.

8 Q And for both your texts and your e-mail,
9 that was by searching for the word "lawsuit" and
10 searching for the word "redistricting"?

11 A Correct.

12 Q Besides those two search terms, did you
13 search for anything else?

14 A No.

15 Q What kind of cellphone do you use?

16 A Smartphone, Samsung.

17 Q Samsung? Okay.

18 So other than looking through and
19 searching through your e-mail and your text
20 messages, did you review any other documents to
21 prepare for today?

22 A Other than the deposition, no. The
23 interrogatories that were asked.

24 Q And where do you live?

25 A 422 Eagle Drive, New Town.

1 Q And what county is that in?

2 A Mountrail.

3 Q How long have you lived there?

4 A Eleven years.

5 Q Did you say seven or 11?

6 A Eleven.

7 Q Where did you live before that?

8 A West Fargo, North Dakota.

9 Q And do you have any other residences
10 besides the House in New Town?

11 A No.

12 Q And you're registered to vote at that
13 address?

14 A We're not required to register in North
15 Dakota.

16 Q I'm sorry, I actually knew that. That is
17 the address you use to vote?

18 A Yes.

19 Q And that -- am I right that that's in
20 Legislative District 4 for the state Senate and in
21 District 4A for the State House?

22 Is that right?

23 A Correct.

24 Q What do you do for work?

25 A I am an accountant.

1 Q And where do you work?

2 A At United Quality Cooperative.

3 Q And what's the nature of that business?

4 A Restate question.

5 Q What's the nature of that business?

6 A It is a truck stop, fuel, bulk fuel,
7 grocery store, lumberyard, elevator. It's a Cenex
8 place.

9 Q And how long have you worked there?

10 A Eleven years.

11 Q What's your educational background?

12 A High school graduate and come college.

13 Q Do you hold any positions with any
14 political parties?

15 A Yes.

16 Q And what are those?

17 A I'm the District chair for District 4,
18 I'm the Northwest regional chair for the state
19 party, Republican party.

20 Q How long have you been the District 4
21 Republican chair?

22 A Approximately ten years.

23 Q And that's a position elected by the
24 local party members?

25 A Yes.

1 Q And how long have you been the Northwest
2 regional chair for the party?

3 A Four years.

4 Q Is that also elected?

5 A Yes.

6 Q Do you have any other positions with the
7 North Dakota Republican party?

8 A No.

9 Q What about the national Republican party;
10 do you have any involvement there?

11 A No, none.

12 Q And any other political organizations?

13 A No.

14 Q Have you worked on political campaigns?

15 A Yes; in my district.

16 Q And which types of campaigns?

17 A The legislative for Senator and for
18 Congress for North Dakota.

19 Q I'm going to circle back to your
20 conversation that you had with Mr. Sandstrom.

21 What did he say on that conversation?

22 A I don't -- he just asked if there's any
23 way he could help.

24 Q Did you speak with him by phone in
25 addition to the text exchange?

1 A Other than his reaching out to me by his
2 text, I talked to him by phone.

3 Q And what did you discuss in that
4 conversation?

5 A I don't remember. That's over a year
6 ago.

7 Q Have you run for office other than the
8 party positions?

9 A Yes.

10 Q What offices?

11 A West Fargo School Board. I won.

12 Q Anything else?

13 A No.

14 Q How did you become involved in this
15 lawsuit?

16 A I did not like the fact that I lost a
17 representative to represent me, so talking with
18 people within my district, we decided that I
19 should be the one to represent the people of
20 District 4.

21 Q And did someone -- I know you had this
22 text exchange with Mr. Sandstrom.

23 He reached out to you.

24 Is that right?

25 A He reached out to me after seeing the

1 redistricting process, yes.

2 Q I guess did you generate the idea or did
3 someone come to you as a group or, you know --
4 kind of just give me the sort of your explanation
5 of who talked to who and who was involved and how
6 that came about, please.

7 A Myself, Terry Jones, Donita Bye, and
8 Jordan Kannianen were the executive committee of
9 District 4. We discussed what options would be.

10 Q So I think it would be helpful for the
11 court reporter if you could spell those, the last
12 two names at least. I think Terry Jones, and then
13 I believe there were two other names of the
14 executive committee folks?

15 A Donita Bye is D-O-N-I-T-A, B-Y-E. Jordan
16 Kannianen is J-O-R-D-A-N, K-A-N-N-I-A-N-E-N. He's
17 also my son-in-law.

18 Q Well, it's good that you got his name
19 spelled right.

20 So the four of you -- was this while
21 redistricting was still ongoing in the
22 legislature, or was this after the bill had been
23 passed?

24 A It would be after the bill was passed.

25 Q And aside from Representative Jones and

1 the other two folks you mentioned, was anyone else
2 involved in conversations about the potential to
3 file a lawsuit?

4 A No.

5 Q And Jordan, is it Kannianen?

6 A Kannianen.

7 Q Jordan K, is he a member of the state
8 legislature?

9 A He is the state Senator.

10 Q Okay.

11 A District 4.

12 Q When did you first get in touch with your
13 attorneys in this case?

14 A I will defer to them on that question.

15 Don't remember the date exactly.

16 Q So if you don't know exactly, sort of
17 roughly when would that have been? Was it during
18 the legislative process or afterwards, this year,
19 last year?

20 A It would be short -- very shortly after
21 the redistricting.

22 Q And did you reach out to them or did they
23 reach out to you?

24 MR. SANDERSON: Object to the form, to
25 the extent it calls for attorney-client

1 communications.

2 And, Charles, I'd instruct you not to
3 discuss or testify to any communications you've
4 had with counsel in this deposition.

5 Q And just to be clear, I only mean -- I
6 don't want you to tell me what was said or
7 anything like that. I just mean, you know, who
8 generated the -- who initiated the contact?

9 A I don't remember.

10 Q Who is paying for your legal counsel?

11 A I'm not sure who is all paying. I know a
12 few that are.

13 Q Who can you identify?

14 A Paul Henderson, Terry Jones, Jay
15 Sandstrom. Those are the ones I remember.

16 Q And is there an agreement among that
17 group of people to split, it's like an equal
18 share, or what's the arrangement?

19 A I don't know what the arrangement is.

20 Q Are you aware of -- whether or not you
21 know the name, are you aware that if there are
22 other people or groups who are contributing?

23 A I don't know if there are or not.

24 Q What members of the legislature have you
25 discussed this litigation with?

1 A Terry Jones, Jordan Kannianen
2 and (inaudible.)

3 Q We missed the third one.

4 A Clayton Fegley, who is the 4B
5 representative currently.

6 Q And what have you -- I guess roughly when
7 have you spoken with those three people?

8 A I talk to them regularly, as I'm the
9 District chair.

10 Q And what form does that communication
11 take? Do you ever text with those folks?

12 A All -- it's always verbal. Terry lives
13 one -- about three houses away from me, and
14 Jordan, I see him very often.

15 Q Makes sense. Family.

16 A Right.

17 Q Any other legislators that you have
18 spoken with about this lawsuit?

19 A No.

20 Q Why did you decide to become a plaintiff?

21 A Decide to become a what?

22 Q Why did you decide to become a plaintiff?

23 A Because I feel that someone needs to
24 represent District 4.

25 Q And you're cutting out a little bit. It

1 looks like you said something after "someone needs
2 to represent District 4."

3 A No. That was the end.

4 Q So your objection is that you have -- you
5 get to vote for one state representative rather
6 than two state representatives.

7 Is that correct?

8 A Correct. And now I'm not -- I'm not
9 being represented by two, like I have been in the
10 past. When the rest of the state gets two, I only
11 get one.

12 Q So that's your complaint, that you think
13 you should be able to have two representatives,
14 not just one?

15 A Yes, that is the complaint.

16 Q Is there anything else about the
17 redistricting plan that you object to?

18 A No.

19 Q And the extent of the unequal treatment
20 that you think the plan has is that you're
21 represented by one person rather than two?

22 A Correct.

23 Q And that's the sole reason why you'd like
24 to see the district changed to be one full
25 district?

1 A Correct.

2 Q Would you also like to see the district
3 be represented by two Republicans in the State
4 House?

5 A I would like that personally, yes.

6 Q Did you vote in the 2022 election?

7 A Yes.

8 Q And do you regularly vote in elections?

9 A Yes; every election since I was 18.

10 Q Where does -- so you said that -- I think
11 you said Terry Jones has a house down the street
12 from you.

13 Is that right?

14 A Yes.

15 Q How frequently does he stay there?

16 A All the time. He lives there.

17 MR. GABER: I'm going to take a short
18 break, if that's okay. Maybe ten minutes.

19 THE WITNESS: Okay.

20 (A recess was taken.)

21 MR. GABER: Well, Mr. Walen, I don't have
22 any further questions for you. Thank you for your
23 time. Mr. Phillips, representing the Governor and
24 the Secretary of State, I think will have some
25 questions.

1 THE WITNESS: Okay.

2 EXAMINATION BY COUNSEL FOR DEFENDANTS

3 BY MR. PHILLIPS:

4 Q Thank you, Mr. Walen. I'm -- did we lose
5 him? Oh.

6 A Yeah.

7 Q Mr. Walen, I am David Phillips. I'm the
8 attorney representing the defendants in this case,
9 Governor Burgum and Secretary Jaeger. And I have
10 just a few followup questions for you and we'll
11 get you out of here.

12 Mr. Walen, what is your race or
13 ethnicity?

14 A American, Caucasian.

15 Q I think the very beginning of there cut
16 off. I'm sorry, could you just repeat your
17 answer?

18 A I'm American, Caucasian.

19 Q And white would be another way to
20 describe you?

21 A Yes.

22 Q Do you consider yourself to be Native
23 American?

24 A I am an American native. I was born in
25 this country.

1 Q Would it be fair to say you don't
2 consider yourself to be an American Indian?

3 A Correct.

4 Q I may jump around here a little bit, my
5 apologies in advance. I just wanted to clarify a
6 few things that you testified to earlier.

7 You had talked earlier about running and
8 winning a seat on the West Fargo School Board.

9 Is that correct?

10 A Yes.

11 Q I just want to follow up briefly.

12 What years were you on the school board?

13 A Approximately -- well, it would be in the
14 1990s.

15 Q For how many years?

16 A Four years.

17 Q And a few other clarifications.

18 If I recall correctly, did you say you
19 voted in every election since you were 18?

20 A Yes.

21 Q Were all of those elections in the State
22 of North Dakota?

23 A Yes.

24 Q And would that include all state
25 legislative elections?

1 A Yes.

2 Q And all other state-wide elections?

3 A Yes.

4 Q The home that you're in in New Town, do
5 you own or rent that home?

6 A Own.

7 Q And do you live there all year round, or
8 do you leave for part of the year?

9 A I live here all year round.

10 Q The home that you live in now, is that in
11 the subdistrict that's known as Subdistrict 4A?

12 A Correct.

13 Q Have you ever lived in the subdistrict
14 that's known as Subdistrict 4B?

15 A No.

16 Q In this case the defendants and the
17 intervenors have served what's known as written
18 discovery. Those are interrogatories and requests
19 for production of documents.

20 Do you remember participating in
21 answering those?

22 A Yes.

23 Q And did you sign at the bottom of those
24 answers?

25 A Yes.

1 Q Earlier today you talked about some
2 searching that you did today on your phone and
3 your e-mail.

4 Did you do any searching of electronic
5 records before today for purposes of responding to
6 discovery requests?

7 A No.

8 Q Have you reviewed the legislative record
9 about the 2021 redistricting that's found on the
10 website of our state legislature?

11 A Only to the extent to know what the
12 boundaries were.

13 Q In other words, looking at the boundary
14 maps?

15 A Correct.

16 Q Have you watched any of the videos in the
17 legislative record dealing with the 2021
18 redistricting?

19 A No.

20 Q Other than the maps, have you looked at
21 any other documents in the legislative record?

22 A Yes. I try to look at them when they're
23 in session.

24 Q Which documents would those have been?

25 A Daily -- it would be the videos of the

1 sessions, and then I just watch bits and pieces.

2 Q Those videos, did you watch those live as
3 they were taking place during the redistricting
4 process?

5 A No.

6 Q Other than the videos, have you reviewed
7 any documentation, either before or after the
8 commencement of this lawsuit, generated at the
9 legislature relating to redistricting?

10 A No.

11 Q You had testified earlier about some
12 conversations that you had with North Dakota
13 legislators. And you had mentioned Terry Jones,
14 Clayton Fegley. My handwriting is horrible and
15 the spelling was difficult. Who were the other
16 names again?

17 A Jordan Kannianen.

18 Q And if I --

19 A (Inaudible.)

20 Q Say that one more time?

21 A Senator Jordan Kannianen.

22 Q And was there one more?

23 A No; it was just those three.

24 Q Correct me if I'm wrong. If I remember
25 your testimony, I believe you said that those

1 conversations all took place after the
2 redistricting was completed at the state in 2021.

3 Is that correct?

4 A I talk with them regularly as the
5 district chair.

6 Q Did you talk with them --

7 A Only related to this lawsuit, it would be
8 after.

9 Q Related to the lawsuit, after.

10 What conversations did you have with
11 Terry Jones during the redistricting process?

12 A Just discussed bound -- you know, asking
13 what our boundaries would be.

14 Q Did you have any discussions about the
15 issues you're raising in this lawsuit?

16 A Yes, we could have.

17 Q Do you know how many times you talked to
18 Terry Jones during the redistricting process?

19 A I talked to him almost four or five times
20 a week.

21 Q What about Clayton Fegley; how many times
22 did you talk to Clayton during the redistricting
23 process?

24 A Two, three times, maybe four at most.

25 Q And what did you talk about with Clayton?

1 A How the process was going.

2 Q Do you remember anything that Clayton
3 told you about how the process was going?

4 A No.

5 Q Do you remember anything that you told to
6 Clayton during those conversations?

7 A Yes.

8 Q What did you tell Clayton, that you can
9 recall?

10 A That depending on how the redistricting
11 turned out, that we'd look at what legal action we
12 could take to keep it together, if they decided to
13 split it.

14 Q When you say "keep it together," do you
15 mean not subdistricted?

16 A Correct.

17 Q How many conversations during the
18 redistricting process did you have with Jordan,
19 and I won't attempt the last name.

20 A Regarding the lawsuit, not that many. He
21 is my son-in-law, so I communicate with him daily.

22 Q And during the redistricting process you
23 had multiple conversations with him?

24 A Yes.

25 Q And do you remember anything that he told

1 you in those conversations during the
2 redistricting process about the redistricting
3 process?

4 A No.

5 Q Do you remember anything that you told
6 him during the redistricting process about the
7 redistricting process?

8 A That if -- that if the district got
9 split, that we'd look at what legal actions we
10 could take to keep it together.

11 Q Did you have any conversations with any
12 of those three individuals during the
13 redistricting process about the Voting Rights Act?

14 A No.

15 Q Have you ever had a conversation with
16 anyone employed with the North Dakota Legislative
17 Council about the 2021 redistricting process?

18 A No.

19 Q Have you ever had a conversation with
20 anyone else who's employed by or is an agent of
21 the State of North Dakota about the 2021
22 redistricting process?

23 A No.

24 Q Did you, personally, attend or provide
25 any testimony at any of the committee hearings or

1 debates on redistricting in 2021?

2 A No.

3 Q Have you hired an expert to testify at
4 trial about the Voting Rights Act in this case?

5 A I have not.

6 Q Were you aware of whether or not the
7 plaintiffs have done so, including you or your
8 co-plaintiffs?

9 A You'll have to ask the attorneys.

10 MR. PHILLIPS: Let's take a short break.
11 We'll go off the record for just a few minutes.

12 (A recess was taken.)

13 BY MR. PHILLIPS:

14 Q You testified earlier about going through
15 and searching your e-mails and texts today.

16 Since the commencement of this lawsuit,
17 have you deleted any texts that have been deleted
18 and wouldn't have shown up in your results?

19 A No.

20 Q Do you keep all of your text messages
21 without ever deleting them?

22 A They're -- after a period of time they're
23 automatically deleted. I don't know what that
24 time frame is.

25 Q From your Samsung phone?

1 A Correct.

2 Q And what about your e-mails; are they --
3 have they been deleted either automatically or by
4 you since the commencement of this lawsuit?

5 A Not that I'm aware of.

6 Q So we will likely be making a followup
7 request in this case. And so I would ask that you
8 preserve and don't make any deletions, to the
9 extent it's already happened don't do any further
10 deletions of any texts on your phone or any
11 e-mails so that we can make that request and that
12 they don't get inadvertently deleted.

13 And additionally, I would also ask, we'll
14 likely make a request for the notes that you
15 discussed earlier that you took in the last
16 deposition today, the first deposition today, I
17 should say. I'd request that you keep those and
18 hold on to them, too, because we'll likely be
19 making a request for a copy of those.

20 A I will send those to the attorney, to our
21 attorneys.

22 Q Perfect.

23 MR. PHILLIPS: Thank you. I have no
24 further questions.

25 Mr. Gaber?

1 MR. GABER: Nothing further from me.

2 Thank you, Mr. Walen, I appreciate it.

3 MR. SANDERSON: And, Chuck, you have the
4 right to read and sign your deposition or you can
5 waive that right. It's up to you. Paul waived
6 his earlier, if that's what you want to do.

7 THE WITNESS: I can waive it.

8 MR. SANDERSON: All right. Chuck, thank
9 you for your time.

10 COURT REPORTER: Mr. Phillips, same order
11 as earlier?

12 MR. PHILLIPS: Yes.

13 COURT REPORTER: Mr. Sanderson, same
14 order as earlier?

15 MR. SANDERSON: Same order, please.

16 COURT REPORTER: Thank you.

17 (Off the record at 2:57 p.m. EST.)

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ACKNOWLEDGMENT OF DEPONENT

I, CHARLES LEANDER WALEN, do hereby
acknowledge that I have read and examined the
foregoing testimony, and the same is a true,
correct and complete transcription of the
testimony given by me, and any corrections appear
on the attached Errata sheet signed by me.

(DATE)

(SIGNATURE)

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Debra A. Whitehead, the officer before whom the
3 foregoing proceedings were taken, do hereby certify
4 that the foregoing transcript is a true and correct
5 record of the proceedings; that said proceedings
6 were taken by me stenographically and thereafter
7 reduced to typewriting under my supervision; that
8 reading and signing was not requested; and that I am
9 neither counsel for, related to, nor employed by any
10 of the parties to this case and have no interest,
11 financial or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my hand and
13 affixed my notarial seal this 16th day of December,
14 2022.

15
16 My commission expires:

17 April 30, 2023



21 -----
22 E-NOTARY PUBLIC IN AND FOR THE
23 STATE OF MARYLAND
24
25

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