

Mastering The Deposition Process

June 7, 2022

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The Process



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The Couplet is King



3. Martin Curry - Confidential - December 9, 2020

1 other potential agreement from Mark's? anyone before
2 just talk Mark's right?
3 A. I don't know we talk or anything. And the
4 reason for that - the reason I don't know is because
5 I'm not a lead source in - you know, often we were at
6 Mark's, we had access to that, stuff, we talk, I can't
7 have really gotten to know the Mark's family network
8. I'm not a lead source, but after we at
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1 with their services from and how they would run things
2 differently.
3 And, like I mentioned earlier, my
4 conversation with Jason that summer - was one of many in
5 the same regard.
6 I got to know in the sense that we
7 were - you know, we and other people were looking
8 at what we thought were certain objectives of the way
9 that Michael Smith was run, and we thought we had
10 better solutions.
11 But in terms of opinion, like, this, you
12 know, this is something we're going to strongly do,
13 that would have been much later.
14 Q. And did you ever get a date on that?
15 I'm not sure of the date, like, this is the date
16 something we're going to do?
17 A. Yes, we were.
18 Q. On the 15th, January? How did that work in the
19 timeline of 2012 - was I, I don't see, early January at
20 2012, when you usually did that?
21 A. Very, very close to that, if not for that time
22 frame.
23 Q. Now, did you speak with people at Viracox
24 about the idea of starting a new firm with Jason
25 back then?
26 A. Yes.
27 Q. And at what point did you actually speak to
28 Viracox about that possibility?
29 A. That had been sometime, summer of 2012.
30 Q. In the summer of 2012?
31 A. Yes.
32 Q. Okay. Let me know this conversation was
33 about
34 A. I was working, and Mr. Cassidy had not yet
35 arrived in town at, you know, what had happened in the
36 week that was Mr. Matthew the only person that
37 I had had conversations with or Viracox prior to leaving
38 the country, a year time.
39 Q. Okay. And what was the conversation about?
40 A. It was about the idea of starting a new firm with
41 Jason or anyone else, like Mr. Matthew, like I was
42 talking with anyone at Viracox, Mr. Matthew, like I was
43 talking with anyone at Viracox, Mr. Matthew, like I was
44 talking with anyone at Viracox, Mr. Matthew, like I was
45 talking with anyone at Viracox, Mr. Matthew, like I was
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