

CAUSE NO. 2018—DCL-06387-I

RICHARD GALVAN and

SONIA GALVAN

vs

BLAINE CREWS AND HANNAH CREWS

IN THE DISTRICT COURT

445th JUDICIAL DISTRICT

CAMERON COUNTY, TX

Transcript of the Testimony of  
**Sonia Galvan**

**Date:**

May 15, 2020

**Case:**

Richard Galvan vs Blaine Crews

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CAUSE NO. 2018-DCL-06387-I

RICHARD GALVAN and	)	IN THE DISTRICT COURT
SONIA GALVAN,	)	
Plaintiffs,	)	
	)	
VS.	)	445th JUDICIAL DISTRICT
	)	
BLAINE CREWS and	)	
HANNAH CREWS,	)	
Defendants.	)	CAMERON COUNTY, TEXAS

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ORAL DEPOSITION OF  
SONIA GALVAN  
MAY 15, 2020

[REPORTED REMOTELY VIA VIDEOCONFERENCE]

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ORAL DEPOSITION OF SONIA GALVAN, produced as a witness at the instance of the Defendants and duly sworn, was taken in the above-styled and numbered cause on May 15, 2020, from 10:05 a.m. to 3:27 p.m., before Cathey Rimmer, CSR in and for the State of Texas, reported by machine shorthand, the witness being located at the offices of G5 Internet Service, 222 East Van Buren, Suite 502, Harlingen, Texas, pursuant to the Texas Rules of Civil Procedure, the First Emergency Order Regarding the COVID-19 State of Disaster, and the provisions stated on the record or attached hereto.

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Page 6

1 MS. NIX: Angela Nix, counsel for  
 2 Plaintiffs Galvans, out of Brownsville, Texas.  
 3 Mr. Chapman, two small housekeeping matters for the  
 4 record before we begin.  
 5 MR. CHAPMAN: Sure.  
 6 MS. NIX: Because Defendant Blaine Crews is  
 7 purportedly attending this deposition but has video  
 8 blanked and audio blanked, I feel compelled to put on  
 9 the record and request reassurance that there is no  
 10 separate audio or video recording of these depositions  
 11 being made --  
 12 MR. CHAPMAN: There's none.  
 13 MS. NIX: -- by the Crewses.  
 14 MR. CHAPMAN: There is none.  
 15 MS. NIX: Because that, of course, or  
 16 posting of any such --  
 17 MR. CHAPMAN: Correct.  
 18 MS. NIX: -- on any website or blog --  
 19 MR. CHAPMAN: Correct.  
 20 MS. NIX: -- would be sanctionable.  
 21 MR. CHAPMAN: Well --  
 22 MS. NIX: Thank you. Also, Mr. Chapman --  
 23 MR. CHAPMAN: -- I disagree with the idea  
 24 that something would be sanctionable, but we're not  
 25 going to short out our videographer that we agreed to

Page 7

1 pay by having a separate recording that would,  
 2 obviously, be of lower quality. So we are not recording  
 3 this. Mr. Crews is not recording it. I'm not recording  
 4 it in any fashion other than what I've requested through  
 5 the official court reporter and will be made available  
 6 as an official -- official record in this case.  
 7 MS. NIX: I appreciate that. And the  
 8 second issue that I wanted just to clarify. You did say  
 9 that you would be sending yesterday's exhibits but I  
 10 have not received those, but Ms. Rimmer said something  
 11 about you might be sending them at the conclusion of  
 12 this depo.  
 13 MR. CHAPMAN: Okay. Hold on a second. I  
 14 sent them -- I just forwarded them to Ms. Rimmer via  
 15 email, and I believe I didn't -- I meant to include you  
 16 on that. I apologize. Let me get that done so you'll  
 17 get it. You should get a -- what address should I  
 18 forward them to? There we are.  
 19 Angelanixattorney@gmail?  
 20 MS. NIX: It's annnixattorney@gmail.  
 21 MR. CHAPMAN: I've got it.  
 22 MS. NIX: That would be fine. Thank you.  
 23 MR. CHAPMAN: All right. Here we go.  
 24 MS. NIX: And that was all, Mr. Chapman. I  
 25 appreciate the moment. Thank you.

Page 8

1 MR. CHAPMAN: Okay. While we're talking  
 2 about the exhibits, Ms. Nix, let me just get other  
 3 agreements from you. I had 15 exhibits from yesterday.  
 4 I'm not going to renumber those exhibits for today. I'm  
 5 only going to add to so we will have a consecutive set  
 6 of exhibits for both parties.  
 7 MS. NIX: No objection.  
 8 MR. CHAPMAN: All right. And you just got  
 9 an email. I sent it to Gloria as well with the -- it's  
 10 a zip drive with 1 through 15. Ms. Rimmer, did you get  
 11 that on your email?  
 12 COURT REPORTER: Yes, I just got it.  
 13 MR. CHAPMAN: Okay. All right. Let's get  
 14 started. Could you state --  
 15 COURT REPORTER: Okay. Well, let me swear  
 16 the witness in, please.  
 17 MR. CHAPMAN: Oh, sorry. We didn't do  
 18 that. We did the video.  
 19 (Witness sworn.)  
 20 SONIA GALVAN,  
 21 having been first duly sworn, testified as follows:  
 22 EXAMINATION  
 23 BY MR. CHAPMAN:  
 24 Q. Okay. Could you state your name for the  
 25 record, ma'am?

Page 9

1 A. Sonia Galvan.  
 2 Q. I'm having a very hard time hearing your  
 3 answer.  
 4 MS. NIX: Speak up.  
 5 THE WITNESS: Sonia Galvan.  
 6 Q. (BY MR. CHAPMAN) There we go. I was  
 7 concerned. I will tell you, Ms. Galvan, I had a  
 8 mediation myself, and my clients were together in a room  
 9 last week, and they had a very directional microphone  
 10 and they kind of had to switch chairs every time one of  
 11 them wanted to talk to the mediator. It was very  
 12 confusing. Anyways, I could hear your last answer.  
 13 Ms. Galvan, you were present for the  
 14 deposition of your husband Richard Galvan yesterday; is  
 15 that correct?  
 16 A. That's correct.  
 17 Q. I understand you may have left to go get some  
 18 food at some point around the lunch hour. Were you  
 19 present for the rest of it as far as you recall?  
 20 A. Yes.  
 21 Q. Okay. All right. I think because of that we  
 22 should be able to go a bit quicker on some of this  
 23 stuff, and I'll try to be as conservative as I can with  
 24 your time, and I know that you probably recall some of  
 25 the things I said at the beginning of the depo yesterday

Page 10

1 to your husband but let's get these on the record just  
 2 so we know the ground rules.  
 3 What's your full name, ma'am? Did you give  
 4 me your middle name?  
 5 A. Garza. My maiden name.  
 6 Q. Thank you. All right. We're conducting this  
 7 via Zoom as allowed by the current Supreme Court  
 8 emergency orders. Doing this is just as if we were in a  
 9 conference room with the reporter right next to you and  
 10 you at the end of a conference table and me talking to  
 11 you in person. You are under oath just as you would be  
 12 if you were sworn in in front of a judge and jury at the  
 13 courthouse, and your testimony, subject certainly to  
 14 rulings on counsel's objections, if there are any, may  
 15 be used at any trial or proceeding in this case as if it  
 16 was given live in the courthouse. I'm going to ask you  
 17 questions, and then you answer the question I have out  
 18 there the best you can. If you don't understand the  
 19 question, please feel free to tell me that you have --  
 20 you know, you don't understand the question. I'll try  
 21 to rephrase and clarify the best that I can. If you  
 22 need to take a break at any time, just let me know. I'm  
 23 just going to ask that you -- that you answer the  
 24 question that's out there on the record before you do.  
 25 Likewise, in addition to that -- Mr. Galvan I don't

Page 11

1 think did this at all yesterday but I'll say it just in  
 2 case. Answers that sound like uh-huh and huh-uh sound  
 3 the same to the court reporter when she's trying to type  
 4 it, so try to use yes or no. I know we're videoing  
 5 this, but head nods don't come off on a transcript very  
 6 good, so try to give me an oral response. Sometime --  
 7 it only happened maybe once or twice that I recall  
 8 yesterday, but it may be that the audio hangs up or the  
 9 video freezes or something like that and you don't hear  
 10 my question. Just let me know if that's the case and  
 11 I'll repeat it louder and slower or again, and hopefully  
 12 the system that we're using will allow you to hear it  
 13 clearly. If I don't hear that kind of thing from you,  
 14 I'm going to presume that you've heard my question. If  
 15 you don't ask me to rephrase it, I'm going to presume  
 16 that you understand it. Is that fair?  
 17 A. Yes, it is.  
 18 Q. Okay. Very good. Ms. Galvan, what documents  
 19 have you reviewed in preparation for your deposition  
 20 here this morning?  
 21 A. I reviewed the -- the -- what are these called?  
 22 My answers to the -- I'm sorry.  
 23 Q. I'm not trying to trick you. If I call it  
 24 written discovery, will you understand what I'm talking  
 25 about?

Page 12

1 A. Yes. That, yes.  
 2 Q. I sent you some interrogatories, some requests  
 3 for production and some admissions, requests for  
 4 admissions. It's your testimony this morning that you  
 5 reviewed those in preparation for your testimony?  
 6 A. Yes, I did.  
 7 Q. Okay. Did you review any of the pleadings in  
 8 this case?  
 9 A. Yes, I did.  
 10 Q. Okay. Did you review your affidavits that have  
 11 been filed in this case?  
 12 A. Yes, I did.  
 13 Q. Okay. Have you reviewed any of the additional  
 14 motions that have been filed by the attorneys in this  
 15 case?  
 16 A. No.  
 17 Q. Okay. Did you review any of the documents from  
 18 the Court of Appeals?  
 19 A. No, I did not.  
 20 Q. Have you reviewed any journals or notes that  
 21 you've kept to refresh your recollection in matters you  
 22 expect to testify about today?  
 23 A. Can you clarify notes?  
 24 Q. Yeah. If you've kept any journals or anything  
 25 and you used that to prepare for your deposition, I just

Page 13

1 want to know what you looked at.  
 2 A. I don't have any notes.  
 3 Q. Okay. Very good. Did you have any  
 4 conversations with anybody in preparation for your  
 5 deposition today?  
 6 MS. NIX: Objection; form insofar as if  
 7 there would be any conversations with me.  
 8 Q. (BY MR. CHAPMAN) Sure. Let me be clear, and I  
 9 did this with Richard probably right off the gate.  
 10 Throughout the duration of this deposition I don't want  
 11 you to think that I'm asking you about anything that you  
 12 talked about with any of your lawyers. That's  
 13 privileged and I don't want to ask about that. I will  
 14 try to carve that out as best I can in my questioning.  
 15 But for purposes of answering my questions,  
 16 conversations you have had with your lawyers, past or  
 17 present, are not something that you need to offer to me  
 18 in your responses.  
 19 Having said that, did you talk with anybody  
 20 in order to help prepare for your deposition today other  
 21 than your lawyer?  
 22 A. No.  
 23 Q. Did you meet with Ms. Nix to help prepare you  
 24 for your deposition today?  
 25 A. No. Well, yes.

Page 14

1 Q. Okay. Can you tell me, as best you can recall,  
 2 how much time you spent preparing for your deposition?  
 3 A. I don't know. Maybe about an hour or so.  
 4 Q. Okay. Very good. Can you give me your -- for  
 5 purpose of identification and with the same agreements  
 6 that these will not be used in any filed document or  
 7 published anywhere, Ms. Nix, that we had with Mr. Galvan  
 8 yesterday, Ms. Galvan, could you give me your Texas  
 9 driver's license number?  
 10 A. I don't have it with me.  
 11 Q. Okay. Do you know your Social --  
 12 MS. NIX: We agree to provide the Texas  
 13 driver's license number and the last three digits of the  
 14 Social.  
 15 MR. CHAPMAN: Okay. Thank you.  
 16 Q. (BY MR. CHAPMAN) I believe, Ms. Galvan, you  
 17 said your middle name was Garcia and that was your  
 18 maiden name; is that correct?  
 19 A. It's Garza.  
 20 Q. Oh, Garza. I'm so sorry. My apologies.  
 21 Garza. So at some point you went by Garza as your last  
 22 name, correct? Have you gone by any other -- any other  
 23 names in your lifetime?  
 24 A. No.  
 25 Q. What's your date of birth, ma'am?

Page 15

1 A. 9/30/73.  
 2 Q. And let's get a bit of background about you.  
 3 Where did you grow up, Ms. Galvan?  
 4 A. The majority of my life, here in Harlingen.  
 5 Q. Okay. Did you go to primary school and  
 6 secondary school in Harlingen?  
 7 A. Yes.  
 8 Q. Did you graduate from high school in Harlingen?  
 9 A. Yes, did I.  
 10 Q. What high school did you go to?  
 11 A. Harlingen High School.  
 12 Q. What year did you get out?  
 13 A. '91.  
 14 Q. And your current residence is on Sparrow Drive  
 15 or Sparrow Road?  
 16 A. That's correct.  
 17 Q. How long have you lived there?  
 18 A. Since 2002. 2002.  
 19 Q. Okay. Following your graduation from Harlingen  
 20 High School did you go to college or pursue any  
 21 education past high school?  
 22 A. I did. I went to a school in East Texas for  
 23 about a year and a half, came home, and then I finally  
 24 finished at UTSA, the University of Texas at  
 25 San Antonio, in '97.

Page 16

1 Q. So you have a degree from UTSA from 1997?  
 2 A. That's correct.  
 3 Q. Okay. Where did you go in East Texas?  
 4 A. Kilgore.  
 5 Q. I'm sorry. What was that?  
 6 A. Kilgore Junior College.  
 7 Q. Oh, okay. Were you a Rangerette?  
 8 A. I was not.  
 9 Q. Okay. That's what everybody thinks about with  
 10 those East Texas schools, the SFA and Kilgore. Is there  
 11 one in Lufkin as well? I forget. Okay. In '97 when  
 12 you graduated UTSA what was your degree in?  
 13 A. Business management.  
 14 Q. Did you pursue any -- that's a BBA, I take it,  
 15 right?  
 16 A. That's correct.  
 17 Q. Did you pursue any postgraduate work after you  
 18 got your BBA?  
 19 A. I went to mortuary school.  
 20 Q. Okay. Where did you go for that?  
 21 A. Commonwealth in Houston.  
 22 Q. How long does that -- how long does that take?  
 23 I do not know.  
 24 A. Six months.  
 25 Q. Okay. After you got out of mortuary school did

Page 17

1 you go to work in that industry?  
 2 A. I sure did.  
 3 Q. Okay. Where did you go work?  
 4 A. At Rudy Garza Funeral Home.  
 5 Q. Where is that?  
 6 A. That's here in Harlingen.  
 7 Q. Okay. When did you start -- is that a business  
 8 that might be owned by your family?  
 9 A. It sure is.  
 10 Q. Okay. Very good. When did you start back at  
 11 the family funeral home?  
 12 A. In '98.  
 13 Q. '98? And what was your job there?  
 14 A. A funeral director.  
 15 Q. And how long did you work as a funeral director  
 16 for the Garza Funeral Home?  
 17 A. Until about -- full time until about -- maybe  
 18 to about 2009, '08 to '09.  
 19 Q. Okay. And did you end up doing -- taking a  
 20 different job after 2009 when you left the funeral home?  
 21 A. I stayed home and worked part time.  
 22 Q. When you worked part time were you working for  
 23 some of the businesses that your husband had started or  
 24 you and your husband had started?  
 25 A. That's correct.

Page 18

1 Q. What was the first one that you started working  
 2 for when you -- well, strike that. Let me ask a better  
 3 question. When did you start working for the businesses  
 4 that y'all had started? Were you still working at the  
 5 funeral home and doing that part time as well?  
 6 A. Yeah, I was working part time, so really I  
 7 first started in about 2000-- I think it was '07.  
 8 Q. 2007? And would that have been for MDI?  
 9 A. That's correct.  
 10 Q. What did you do for MDI?  
 11 A. Accounts payable, accounts receivables,  
 12 invoicing.  
 13 Q. Okay. And how long did you continue to do that  
 14 for MDI?  
 15 A. I really don't know.  
 16 Q. Okay. If MDI needed accounts payable or  
 17 receivable work right now, would that be something you'd  
 18 probably take on or is there somebody else that would  
 19 handle that now?  
 20 A. No, I don't do that.  
 21 Q. Okay. My understanding is now MDI doesn't have  
 22 any active business but holds, you know, a piece of real  
 23 property and receives the rent from this property on, I  
 24 think, Vogel Street. Is that your understanding as  
 25 well?

Page 19

1 A. That's correct.  
 2 Q. Okay. Do you handle whatever bookkeeping needs  
 3 to be done with that, those transactions and the  
 4 maintenance of that real property?  
 5 A. No, I don't.  
 6 Q. Okay. Do you know who does?  
 7 A. No, I don't.  
 8 Q. Okay. Are you a 50 percent owner of MDI?  
 9 A. I am.  
 10 Q. Okay. Very good. Did you work for -- do work  
 11 for Orbit Broadband when that was started?  
 12 A. Yes, I did.  
 13 Q. Did you do work for Orbit Broadband from the  
 14 time that it was started?  
 15 A. I don't recall.  
 16 Q. Okay. Were you a 50 percent owner of Orbit  
 17 Broadband as well?  
 18 A. I don't recall.  
 19 Q. Okay. What did you do for Orbit Broadband?  
 20 A. Same thing. Accounts payable, accounts  
 21 receivables, invoicing.  
 22 Q. Did Orbit Broadband use electronic accounting  
 23 software, like QuickBooks or something similar?  
 24 A. Yes.  
 25 Q. Did you -- were you the person that set up the

Page 20

1 QuickBooks and ran the QuickBooks for Orbit?  
 2 A. I didn't set it up but I just did the invoicing  
 3 and billing.  
 4 Q. Okay. And did you do that throughout the time  
 5 that Orbit Broadband existed?  
 6 A. No, just part time.  
 7 Q. Okay. Was there somebody else with Orbit that  
 8 also did that same kind of work?  
 9 A. Yes.  
 10 Q. Who was that, to your recollection?  
 11 A. I believe it was Jackie Woodard.  
 12 Q. With respect to G5 Internet Services, did you  
 13 do any regular work for G5 Internet Services?  
 14 A. Yes. Same thing. Bookkeeping.  
 15 Q. Okay. Do you share those responsibilities with  
 16 somebody at G5 Internet Services or did you do it all  
 17 for them?  
 18 A. That's what I do today.  
 19 Q. Okay. And does G5 maintain its accounting  
 20 records in QuickBooks or something similar?  
 21 A. That's correct.  
 22 Q. With respect to G5 Streaming, do you do  
 23 similar -- take on a similar role at G5 Streaming with  
 24 keeping books?  
 25 A. Yes, I do.

Page 21

1 Q. And is that also done by QuickBooks or some  
 2 other similar accounting software?  
 3 A. Yes, it is.  
 4 Q. Is it QuickBooks?  
 5 A. QuickBooks, yes.  
 6 Q. Do y'all keep a different sheet or different  
 7 set of books for Streaming and for the Internet Service  
 8 or is it all handled in one consolidated set of books?  
 9 A. Two separate.  
 10 Q. Okay. Very good. When Orbit -- I believe your  
 11 husband's testimony yesterday was that Orbit more or  
 12 less converted into G5 Internet Services due to some  
 13 marketing reasons which he felt the name was better.  
 14 Did you take any active role in preparing any documents  
 15 or moving assets or anything like that when Orbit was  
 16 being reformed into G5 Internet Services?  
 17 A. No, not to my knowledge.  
 18 Q. Okay. Did the QuickBooks files for Orbit just  
 19 get renamed into G5 and imported that way?  
 20 A. I don't remember. I don't know how that was  
 21 done.  
 22 Q. Okay. Very good. We know that you had -- your  
 23 family has a funeral home there, I guess, in Cameron  
 24 County, correct?  
 25 A. Yes.

Page 22

1 Q. And your maiden name is Garza. I don't need  
 2 every cousin, uncle, niece, nephew that you have, but if  
 3 you could please identify for me, Ms. Galvan, the  
 4 surnames of your relatives in Cameron County as best you  
 5 recall?  
 6 A. Cantu. Garza. I think that's it.  
 7 Q. Okay. Great. And did you obtain -- when you  
 8 went to mortuary school do you get a -- do you hold a  
 9 license or certification in that area?  
 10 A. Yes, I do. I have a license.  
 11 Q. What's the license for? Licensed funeral  
 12 director?  
 13 A. The license, yes, to make funeral arrangements.  
 14 Q. Okay. Do you still keep a funeral director's  
 15 license?  
 16 A. Yes, I do.  
 17 Q. Okay. Has that license ever been suspended or  
 18 revoked for any reason?  
 19 A. No.  
 20 Q. Other than the funeral director's license, do  
 21 you hold any occupation -- other occupational licenses  
 22 or certifications?  
 23 A. No, I don't.  
 24 Q. Can you tell me, Ms. Galvan, what local civic  
 25 organizations and volunteer type organizations you

Page 23

1 participate in in Cameron County?  
 2 A. Right now? None.  
 3 Q. What have you participated in in the last five  
 4 years?  
 5 A. In the last five years. Let's see. I can't  
 6 recall anything right now.  
 7 Q. Okay. Were you active in the FCA along with  
 8 your husband?  
 9 A. No, I was not on the board.  
 10 Q. Okay. Are you involved in any school-based  
 11 organizations related to schools for your children?  
 12 PTA? School boards?  
 13 A. Okay. Yes, this last year I was on the PTSA, I  
 14 think it's called.  
 15 Q. Okay. I'm not going to hold you to those  
 16 initials. That's a parent/teacher group, correct?  
 17 A. Uh-huh.  
 18 Q. Is that yes?  
 19 A. Yes.  
 20 Q. There we go. Were you on the Economic  
 21 Development Board for Mercedes or for Harlingen with  
 22 your husband?  
 23 A. No.  
 24 Q. Okay. Did you do anything with the Chamber of  
 25 Commerce separately from your husband's involvement?

Page 24

1 A. No.  
 2 Q. Okay. That's actually the country club. Were  
 3 you on the country club board?  
 4 A. Yes.  
 5 Q. With respect to churches that y'all have  
 6 attended over the years, Mr. Galvan yesterday identified  
 7 the North Way Bible Church, Livingway Church, Church of  
 8 the Living Word, Valley International Church, I believe,  
 9 as churches that y'all had attended at least at some  
 10 point. Are there any others that you can think of?  
 11 A. No.  
 12 Q. Have you held any appointed positions or titles  
 13 in any of the churches that you've attended with  
 14 Mr. Galvan?  
 15 A. No.  
 16 Q. Okay. Now, Mrs. Galvan, you've admitted that  
 17 you were a youth minister or youth pastor at North Way  
 18 Bible Church; is that correct?  
 19 A. No.  
 20 Q. You're now telling me that's incorrect?  
 21 A. That's correct. I was not a youth minister or  
 22 a youth leader at North Way Bible Church.  
 23 Q. Do you recall that you admitted that to my  
 24 clients in a request for admission in February of 2020?  
 25 A. No, I don't recall.

Page 25

1 Q. Okay. We'll get to that in a minute. You  
 2 haven't filed or submitted any supplemental or changes  
 3 to your requests for admissions since February 2020,  
 4 have you?  
 5 A. No, not yet.  
 6 Q. Okay. So is it going to be your testimony here  
 7 today that you held no official positions of any type at  
 8 North Way Bible Church in the time period of 2007, 2008,  
 9 2009?  
 10 A. Yes.  
 11 Q. Can you describe for me how you would  
 12 characterize your involvement at North Way Bible Church?  
 13 A. I helped coordinate mission trips, fundraisers  
 14 for the youth and for any adults that wanted to attend a  
 15 mission trip.  
 16 Q. As a matter of housekeeping, Ms. Galvan, have  
 17 you been a party -- well, have you given your deposition  
 18 testimony in any other lawsuit that you recall?  
 19 A. In any other lawsuit? Is that what you said?  
 20 Q. Yeah. Have you given a deposition before?  
 21 A. Once before.  
 22 Q. Was that in the Salazar wrongful death type  
 23 case that Mr. Galvan talked about?  
 24 A. No.  
 25 Q. Okay. What case did you give a deposition in?



Page 26

1 A. It was -- I was in high school. It was a small  
 2 car accident.  
 3 Q. Ah. Were you a driver of a car that ended  
 4 up -- where there ended up being a lawsuit?  
 5 A. Yes.  
 6 Q. Okay. Were you represented by your insurance  
 7 company's retained lawyer at that time?  
 8 A. Yes.  
 9 Q. Other than that deposition, do you recall any  
 10 other times you've given deposition testimony?  
 11 A. No.  
 12 Q. Do you recall ever being sworn in and giving  
 13 live testimony at a trial?  
 14 A. No.  
 15 Q. You have never been divorced, correct?  
 16 A. That's correct.  
 17 Q. Okay. And you have no other family law type  
 18 lawsuits that you've ever been involved in, correct?  
 19 A. No, not that I'm aware of.  
 20 Q. Okay. Have you been the subject of any  
 21 criminal prosecution, criminal type lawsuits?  
 22 A. No.  
 23 Q. Okay. With respect to the businesses that you  
 24 have with your husband, let's start with MDI. Are you  
 25 aware whether MDI keeps any set of corporate books or

Page 27

1 records?  
 2 A. No, I'm not aware.  
 3 Q. Okay. If I say corporate books, do you know  
 4 I'm talking -- usually it's like some binder that has  
 5 all the certificates of formation, bylaws, company  
 6 agreements, whatever, minutes of the company. Being a  
 7 business major, you understand the type of documents I'm  
 8 talking about?  
 9 A. Yes, I do understand.  
 10 Q. Okay. Have you ever seen any of those for MDI?  
 11 A. I have not.  
 12 Q. Okay. With respect to Orbit Broadband -- the  
 13 same type of questions -- are you aware of any corporate  
 14 books being kept for Orbit Broadband?  
 15 A. No, I am not.  
 16 Q. Okay. With respect to the types of documents  
 17 that would be normally kept in a set of corporate books,  
 18 certificates of formation, company agreements, bylaws,  
 19 minutes, resolutions that sort of thing, have you ever  
 20 seen any of that sort of thing with respect to Orbit  
 21 Broadband?  
 22 A. I have not seen them.  
 23 Q. Okay. Did you have any participation actively  
 24 in the Orbit Broadband lawsuit related to the Salazars'  
 25 claim?

Page 28

1 A. No.  
 2 Q. Okay. With respect to G5 Internet Services,  
 3 have you ever seen a set of corporate books kept for G5  
 4 Internet Services?  
 5 A. No, I have not seen the corporate books.  
 6 Q. With respect to documents that would typically  
 7 be in a set of corporate books, like I described for the  
 8 other entities, bylaws, certificates of formation and  
 9 the like, have you ever seen any of those types of  
 10 documents for G5 Internet Services?  
 11 A. No, I have not.  
 12 Q. Have you ever seen those type of documents,  
 13 bylaws, certificates of formation, minutes, company  
 14 agreements and the like, for G5 Streaming?  
 15 A. No, I have not.  
 16 Q. With respect to all of those entities, do you  
 17 have any idea as we sit here today where those documents  
 18 might be kept?  
 19 A. I am not sure.  
 20 Q. Do you know if you and your husband formed G5  
 21 Internet Services yourselves or did you use an attorney  
 22 to do that?  
 23 A. I'm not -- I'm not sure.  
 24 Q. Okay. Do you know whether you used an attorney  
 25 to form any of the other entities that we've talked

Page 29

1 about, MDI, G5 Streaming and Orbit Broadband?  
 2 A. No, I'm not sure if we used an attorney.  
 3 Q. Okay. With respect to 59.03 Nexus, LLC, have  
 4 you had any active involvement in that business at all?  
 5 A. No, I have not.  
 6 Q. You don't keep the books for that business,  
 7 correct?  
 8 A. No.  
 9 Q. Do you know who does?  
 10 A. I don't.  
 11 Q. Have you ever logged in or seen QuickBooks for  
 12 that business?  
 13 A. No, I have not.  
 14 Q. Okay. With respect to -- now, we know that MDI  
 15 is no longer doing any business other than receiving  
 16 rental income for Vogel. Orbit turned into G5 Internet  
 17 Services. With respect to G5 Internet Services, do you  
 18 know where the business documents for that business are  
 19 kept physically?  
 20 A. No.  
 21 Q. Would they be in the building that you're in  
 22 now or the building on Vogel Street?  
 23 A. I'm not sure.  
 24 Q. Okay. With respect to G5 Streaming, do you  
 25 know where the business documents for that entity are

Page 30

1 kept?

2 A. No.

3 Q. Okay. When you access the QuickBooks for G5

4 Internet Services, what computer do you use to do that

5 from?

6 A. My computer at home.

7 Q. Okay. Are the QuickBooks for G5 Internet

8 Services kept on that computer locally or are they -- is

9 it Cloud based where you log in and they're kept

10 somewhere in the Cloud or a third-party storage?

11 A. It's a third-party storage, I think. I don't

12 know if it's a server. I'm not even sure.

13 Q. Sure. Based on your understanding at least,

14 are the QuickBooks files for G5 something that you -- G5

15 Internet Services something that you could access from

16 any computer as long as you had the log-in information,

17 password, et cetera?

18 A. Not from any computer, no.

19 Q. Okay. Does it need to be your home computer?

20 A. Yes.

21 Q. Okay. Same question with respect to G5

22 Streaming. Do you access that from your home computer

23 when you need to do something with G5 Streaming?

24 A. That's correct. Sorry.

25 Q. And would you need to access that, in your

Page 31

1 opinion, from your home computer in order to access the

2 accounting QuickBooks?

3 A. Yes.

4 Q. About how much time a week do you spend doing

5 bookkeeping type tasks for both the G5 Internet and G5

6 Streaming?

7 A. Maybe like eight to ten hours.

8 Q. Like in a typical week, eight to ten hours for

9 both of those together?

10 A. Well, sometimes. Sometimes less. I mean,

11 maybe five to ten. It just depends on the week.

12 Q. Okay. Do you still do anything part time at

13 the funeral home?

14 A. No, not right now.

15 Q. Okay. All right. Let's move on. Let's see

16 here. I want to turn to some documents in this lawsuit

17 that we're here about today, and we're going to go back

18 to -- we're going to use some of the same exhibits that

19 I was using yesterday. When I was going through these

20 yesterday you did not have access to a computer screen

21 where you could see the documents that I was going

22 through as I went through them; is that fair?

23 A. Yes.

24 Q. Okay. But you were in the room when the audio

25 was streaming and listened to some of it at least,

Page 32

1 correct?

2 MS. NIX: Mr. Chapman, she means, yes, she

3 did see the audio and video.

4 THE WITNESS: Yes.

5 Q. (BY MR. CHAPMAN) Oh, okay. So you could see

6 the screen yesterday?

7 A. Yes.

8 Q. Okay. Excellent. Very good. I'm going to now

9 endeavor to remember how I shared technology yesterday

10 with you. Let's see. Can y'all see a screen with the

11 temporary restraining order pulled up which was

12 Exhibit 1 to Mr. Galvan's depo yesterday?

13 MS. NIX: Yes, sir.

14 THE WITNESS: Uh-huh.

15 Q. (BY MR. CHAPMAN) Okay. Excellent.

16 Ms. Galvan, I'm going to turn -- this is what's called

17 the citation for service on the first page. An

18 officer's return as I'm scrolling down. This is a copy

19 of a temporary restraining order that was issued in this

20 case from the 445th District Court restraining my

21 clients, Blaine and Hannah Crews. Have you seen this

22 document before?

23 A. Yes.

24 Q. When was the first time you saw this

25 restraining order, to your recollection?

Page 33

1 A. I don't know. I don't remember.

2 Q. If your lawsuit was filed sometime around

3 November -- well, do you understand that this lawsuit

4 was filed sometime around November 5th, 2018?

5 A. Yes.

6 Q. You understand that both you and your husband

7 are named plaintiffs in this lawsuit, correct?

8 A. Yes.

9 Q. And as a named plaintiff, you understand that

10 you are making individual claims against both Blaine and

11 Hannah Crews, my clients in this lawsuit. Do you

12 understand that?

13 A. Yes, we were.

14 Q. Okay. You were. At the time of the lawsuit

15 Mr. Galvan, your husband, was making claims against both

16 of my clients, and you individually were also making

17 claims against both of my clients, correct?

18 A. Yes.

19 Q. And you individually were seeking a restraining

20 order against both Blaine and Hannah Crews, correct?

21 A. Yes.

22 Q. Do you recall if you saw this restraining order

23 at or around the time that you filed the lawsuit and it

24 was signed by the court?

25 A. No.

Page 34

1 Q. When do you think you saw this restraining  
 2 order for the first time?  
 3 A. I'm not sure. I don't know.  
 4 Q. Okay. Let me ask you this question,  
 5 Ms. Galvan. With respect to this lawsuit, both you and  
 6 your husband are plaintiffs in the lawsuit, and we've  
 7 gone over the fact that both you and your husband have  
 8 individual claims against -- had individual claims  
 9 against both of my clients. Having said that, did one  
 10 of the two of you, being you or your husband, shoulder  
 11 the majority of the burden related to y'all's  
 12 participation in this lawsuit?  
 13 A. Yes.  
 14 Q. Would that be you or your husband that handled  
 15 the majority of the obligations related to the lawsuit?  
 16 A. That was my husband.  
 17 Q. As we sit here today, do you know what you are  
 18 seeking my clients to be restrained from doing? Strike  
 19 that.  
 20 Back in 2018 when this lawsuit was filed,  
 21 did you have an understanding of what you were seeking  
 22 my clients to be restrained from doing?  
 23 A. Yeah, I guess for them just to stop trying to  
 24 hurt us.  
 25 Q. Okay. You don't -- you don't -- at the time

Page 35

1 that this lawsuit was filed you didn't know the  
 2 particulars of what the restraints entailed or included?  
 3 Is that fair to say?  
 4 A. Not all -- I mean, some of them, but not every  
 5 little detail.  
 6 Q. Okay. Do you recall whether either your  
 7 husband or your attorneys presented this order for you  
 8 to review before it was submitted to the court in  
 9 November of 2018?  
 10 A. No.  
 11 Q. And that was probably a bad question on my  
 12 part. I asked you if you recalled that. I think  
 13 probably what your answer meant -- and let me clarify --  
 14 is you did not review this order before it was submitted  
 15 to the court, correct?  
 16 A. I don't recall.  
 17 Q. Okay. You don't know if you did one way or the  
 18 other?  
 19 A. No, I don't. I don't recall.  
 20 Q. Okay. Did you have an understanding back in  
 21 November 2018 that you and your husband were attempting  
 22 to restrain my clients from speaking about certain  
 23 things to anyone?  
 24 A. Can you ask that again?  
 25 Q. Sure. Let me -- let me -- let's talk about

Page 36

1 something as a predicate to that. You were here for  
 2 your husband's depo yesterday, correct?  
 3 A. Yes.  
 4 Q. If I use the phrase the incident with Hannah  
 5 Crews or Hannah Linn, do you have an understanding of  
 6 what I'm talking about?  
 7 A. Yes.  
 8 Q. Okay. Let's use that going forward. My  
 9 question now that you asked me to rephrase is in  
 10 November 2018 did you have an understanding that both  
 11 you and your husband were seeking to restrain my clients  
 12 from speaking to anyone about the incident related to  
 13 Hannah Crews and your husband?  
 14 A. Yes.  
 15 Q. Okay. Did you have an understanding -- and I'm  
 16 not asking for your understanding now. I'm talking  
 17 about back when this was filed. Was that the same? The  
 18 same was true back then in 2018?  
 19 A. Yes.  
 20 Q. Okay. Back in November of 2018 did you have an  
 21 understanding that you were seeking individually, along  
 22 with your husband, to prevent either one of my clients,  
 23 Blaine or Hannah Crews, from traveling within 1,000 feet  
 24 of your place of worship, your business, your children's  
 25 school, by virtue of this lawsuit?

Page 37

1 A. Yes.  
 2 Q. Did you have any participation in depositing  
 3 \$1500 cash in lieu of bond in relation to this temporary  
 4 restraining order?  
 5 A. No.  
 6 Q. Okay. Ms. Galvan, I'm going to switch up here  
 7 and we're going to go to this original petition which  
 8 was attached as Exhibit 2 to your husband's deposition.  
 9 This again is a citation on the front page. This  
 10 particular copy is a citation to Hannah Crews. Return  
 11 of service. This is the front page of the actual  
 12 document entitled Plaintiffs' Original Petition and  
 13 Application for Injunctive Relief. Do you see that  
 14 document?  
 15 A. Yes.  
 16 Q. Is that a document that you had carefully  
 17 reviewed before it was filed on November 5th, 2018?  
 18 A. I don't know.  
 19 Q. You don't know whether you reviewed this  
 20 document before November 5th, 2018?  
 21 A. No. I don't -- I don't recall.  
 22 Q. You understood though that you and your  
 23 husband -- let me ask you this question, Ms. Galvan.  
 24 Are there any notes or records that you can think of  
 25 that would help you understand or refresh your

Page 38

1 recollection as to whether or not you reviewed this  
 2 original petition and application for injunctive relief  
 3 before it was filed on November 5th, 2018?  
 4 A. No.  
 5 Q. Have you kept any personal records or files  
 6 related to this lawsuit?  
 7 A. No.  
 8 Q. Did you typically get emails of things that  
 9 were filed in this lawsuit around the time that they  
 10 were filed?  
 11 A. No.  
 12 Q. Were you sent copies of documents in this  
 13 lawsuit that were going to be filed by your attorneys  
 14 prior to them being filed?  
 15 A. I don't -- I don't know. I don't recall.  
 16 Q. Okay. With respect to filings by your  
 17 attorneys in this lawsuit, have you ever reviewed any of  
 18 the motions filed by your attorneys?  
 19 A. I don't recall.  
 20 Q. Have you ever reviewed any of the motions filed  
 21 by me on behalf of the Crewses?  
 22 A. No, I don't recall.  
 23 Q. You just don't know whether you've reviewed  
 24 them or not?  
 25 A. Yeah. I don't know. I don't know.

Page 39

1 Q. All right. Let's go forward with this  
 2 petition. I spent -- we're going -- this is the parties  
 3 section, and I'm going to scroll down to a section  
 4 entitled Facts. Do you see that section there in front  
 5 of you?  
 6 A. Yes, I do.  
 7 Q. Okay. Do you recall reviewing a paragraph that  
 8 looked like this before you filed this lawsuit  
 9 November 5th, 2018?  
 10 A. Yes, I think so. Uh-huh.  
 11 Q. Is that a yes?  
 12 A. Yes.  
 13 Q. Okay. Were you in the room and listening when  
 14 your husband was giving answers about the factual  
 15 assertions that you and your husband made originally in  
 16 this lawsuit yesterday?  
 17 A. Yes.  
 18 Q. Okay. In general with respect to the facts  
 19 that y'all alleged in the lawsuit, was there any time  
 20 when you were listening to his testimony concerning the  
 21 facts that are alleged and you thought that you  
 22 disagreed with what he was saying?  
 23 A. No.  
 24 Q. Okay. So on this Facts section it reads, On or  
 25 about October 20th, 2018, Plaintiff Sonia Galvan, at

Page 40

1 9:16 p.m. I received a Facebook message from Defendant  
 2 Blaine Crews in which Defendant Blaine Crews sought  
 3 Sonia Galvan's cell phone number and demanded to speak  
 4 with plaintiffs. Thereafter, on October 21st, 2018, at  
 5 6:38 p.m. Defendant Blaine Crews called Sonia Galvan's  
 6 cell phone but plaintiff did not answer. Immediately  
 7 thereafter Plaintiff Blaine Crews texted Sonia Galvan  
 8 and claimed that Plaintiff Richard Galvan seduced and  
 9 manipulated Defendant Hannah Crews in 2007. I'll stop  
 10 there.  
 11 Do you have any disagreement as we sit here  
 12 today with that recounting of the facts?  
 13 A. No.  
 14 Q. Okay. Those exact times, did you provide those  
 15 to your husband and/or the lawyers?  
 16 A. No.  
 17 Q. Do you recall looking at your phone maybe to  
 18 try to help them get the times to put in this factual  
 19 section?  
 20 A. No.  
 21 Q. Okay. Do you recall actively participating at  
 22 all in drafting the factual assertions in your original  
 23 petition?  
 24 A. No.  
 25 Q. Okay. Thereafter Plaintiff -- I'm in the

Page 41

1 middle of the paragraph where I left off. Thereafter,  
 2 on October 21st, 2018, at 7:01 p.m. Plaintiff Richard  
 3 Galvan called Defendant Blaine Crews. During the  
 4 conversation in which the speaker feature was utilized,  
 5 Plaintiffs heard Defendant Blaine Crews again claim in  
 6 2007 Plaintiff Richard Galvan manipulated and seduced  
 7 Hannah Crews. Defendant Blaine Crews spoke in  
 8 threatening tones and used numerous curse words.  
 9 Defendant Blaine Crews explained he would have put a  
 10 bullet in Plaintiff Richard Galvan's head if Defendant  
 11 Blaine Crews knew Defendant Hannah Crews in 2007.  
 12 Defendant Blaine Crews claimed this phone call would not  
 13 end and that the Plaintiffs' children would learn as  
 14 well.  
 15 Do you have any disagreement as we sit here  
 16 today with that recitation of the facts from your  
 17 original lawsuit?  
 18 A. Yes.  
 19 Q. Okay.  
 20 A. Not learn as well.  
 21 Q. So what part do you disagree with from the part  
 22 that I just read?  
 23 A. On the last part that he said that our children  
 24 would be affected.  
 25 Q. Okay. Is that the only change that you have to

Page 42

1 offer?

2 A. Yes.

3 Q. Okay. The next paragraph starts out, Defendant

4 Blaine Crews told Plaintiffs that Defendant Blaine Crews

5 would call Plaintiffs' church and Plaintiffs' children

6 would be affected as well. Defendant Blaine Crews

7 demanded that Plaintiff Richard Crews [sic] should not

8 ever talk about anything of faith, go anywhere of faith,

9 and will find out what Defendant is going to do to him.

10 Blaine Crews -- Plaintiff Blaine Crews said he did not

11 care of Plaintiff Sonia Galvan or her children. The

12 following day Plaintiffs contacted Plaintiffs' church

13 and advised them that the church would be receiving a

14 similar threatening call.

15 With respect to how far I've gotten in the

16 factual recitations in your original petition on this

17 last reading, do you have any disagreements with those

18 as stated as we sit here today?

19 A. No.

20 Q. On October 25th -- I'm going to read on from

21 where I left off. On October 25th, 2018, at 11:10 a.m.

22 Plaintiffs learned that Defendant Blaine Crews contacted

23 the church the previous day and again claimed

24 manipulation and seduction of Defendant Hannah Crews by

25 Plaintiff Richard Galvan and Plaintiff Sonia Galvan knew

Page 43

1 about it. Plaintiff then told the church that

2 Plaintiffs should not be allowed go to the church. The

3 following day Plaintiff spoke with children's school

4 principal. Because of the threats made on October 26,

5 2018, Plaintiffs contacted the children's school and

6 warned them of a likely campaign of defaming

7 communications coming from Defendant Blaine Crews.

8 That last section that I just read, do you

9 have any objection to the way the facts are recounted in

10 your original lawsuit?

11 A. Hold on. I want to read something real quick.

12 Hold on. Yeah. There was no manipulation or seduction.

13 I don't agree with that.

14 Q. Okay. Anything else in that section that you

15 don't agree with? Well, let me be clear here. I think

16 I understand what you're -- what you're saying, but let

17 me clarify something. Are you saying that Mr. Blaine

18 Crews never claimed manipulation and seduction in his

19 phone call or are you saying that manipulation and

20 seduction did not occur?

21 A. That it did not occur.

22 Q. Okay.

23 A. That it did not occur.

24 Q. Okay. Because as we're reading this, just to

25 clarify it, I'm not trying to be -- to try to move

Page 44

1 things around on you. In this set of facts -- this is

2 your set of facts, and when it mentions manipulation and

3 seduction it's talking about things that you allege

4 Blaine Crews said. You agree with me that you're

5 alleging that he said those things, correct?

6 A. Yes.

7 Q. Okay. Your opinion is just that that did not

8 happen, correct? Is that correct?

9 A. Yes.

10 Q. Okay. Sorry. You kind of hung up on me on my

11 video. Thank you. Back to where I left off. In fear

12 of Defendant Blaine Crews's acts, Plaintiffs withdrew

13 their middle son from one school and enrolled him in

14 another school on October 29, 2018. On October 29,

15 2018, at 5:33 p.m. Plaintiffs received confirmation that

16 Defendant Blaine Crews attempted to contact a school

17 administrator of Plaintiffs' children's school. To date

18 Plaintiffs are not aware who else or where else Blaine

19 Crews will call or show up.

20 With respect to that section that I've

21 recited to you, do you have any disagreement with the

22 facts that were laid out in your original petition?

23 A. No.

24 Q. With respect to the various calls that this

25 lawsuit was filed about, you participated in the call

Page 45

1 wherein Mr. Galvan, your husband, described y'all as

2 leaving the movie where he called Blaine Crews. You

3 participated in that call, correct?

4 A. Yes.

5 Q. Did you -- were you listening to that call or

6 were you also talking in that call?

7 A. I was listening.

8 Q. Okay. Do you recall saying anything to my

9 client, Mr. Blaine Crews, during that call?

10 A. I don't know.

11 Q. Okay. Do you remember my client, Blaine Crews,

12 saying anything directly to you?

13 A. I believe he asked me if I knew.

14 Q. Do you recall your response?

15 A. I said yes.

16 Q. Okay. And for purposes of what we're talking

17 about, I referred to it as the incident between Richard

18 and Hannah, and you know what I'm talking about,

19 correct?

20 A. Yes.

21 Q. And when Blaine said he asked you if you knew,

22 he was talking about that incident, and then when you

23 said you did, you were talking about that same incident,

24 correct?

25 A. I guess. Yeah, I guess so.

Page 46

1 Q. Okay. To get out of looking at just the facts  
 2 in this petition, do you recall when it was that the --  
 3 when was the first time that Mr. Galvan told you about  
 4 the incident with Hannah Linn?  
 5 A. It was around 2017.  
 6 Q. Okay. Sometime in 2007?  
 7 A. I mean 2007. I'm sorry.  
 8 Q. Sometime in 2007, ma'am?  
 9 A. Yes.  
 10 Q. With respect to the phone call between you  
 11 and -- with you and Richard on one end and Blaine Crews  
 12 on the other, do you recall how long that lasted?  
 13 A. I don't know. I don't remember.  
 14 Q. With respect to the messages, be they texts or  
 15 through Facebook or what have you that this lawsuit  
 16 talks about you receiving, have you kept those messages?  
 17 A. No.  
 18 Q. Do you recall if Blaine Crews's language in the  
 19 phone call that you had -- he had with you and your  
 20 husband in October 2018, do you recall if Blaine Crews  
 21 ever used the words manipulation and seduction?  
 22 A. Yes, he did.  
 23 Q. Your testimony here today is those are the  
 24 words that he used?  
 25 A. Yes.

Page 47

1 Q. With respect to conversations with the church  
 2 about Mr. Crews, you did not participate in any of those  
 3 calls, correct?  
 4 A. That's correct.  
 5 Q. You never talked -- Mr. Galvan, your husband,  
 6 said he called Bill Moore. You never talked to Bill  
 7 Moore, did you?  
 8 A. No.  
 9 Q. Were you in the presence of your husband when  
 10 he talked to Bill Moore?  
 11 A. No.  
 12 Q. Were you in the presence of your husband when  
 13 he talked to the various officials at the school, be it  
 14 Tammy Powell or the principal?  
 15 A. I don't recall.  
 16 Q. Okay. You don't recall anything from those  
 17 conversations if you were present, correct?  
 18 A. No.  
 19 Q. Was that a no?  
 20 A. No.  
 21 Q. Yeah. I think when you lean back sometimes the  
 22 microphone kind of drops you a little bit. You don't  
 23 have to lean forward, but I'm not trying to make you  
 24 answer the same question twice. It's just sometimes I  
 25 can't hear it.

Page 48

1 You did not call -- let me ask you this  
 2 way. Did you call or contact in any way any third party  
 3 about Blaine Crews back in October 2018?  
 4 A. No.  
 5 Q. Did your husband handle all of that for the  
 6 both of you?  
 7 A. Yes.  
 8 Q. You don't then have any way to know what was  
 9 said in those calls one way or the other, correct?  
 10 A. When you say calls, do you mean to -- to who?  
 11 Q. Your husband's calls to either the school or  
 12 the church.  
 13 A. Right. No.  
 14 Q. Okay. You can talk about whatever you may  
 15 recall from the call with Blaine Crews and you and your  
 16 husband, certainly. I understand that. Is there  
 17 anything from that call with Blaine Crews and your  
 18 husband that you recall sitting here today that's not  
 19 laid out in the facts you allege in your lawsuit?  
 20 A. No, I don't think so.  
 21 Q. Okay. You never -- let me ask you this way.  
 22 Did you ever review any communications that my client,  
 23 Mr. Blaine Crews, had with any third party concerning  
 24 your husband?  
 25 A. No.

Page 49

1 Q. Did you have in October 2018 any communications  
 2 with Hannah Crews?  
 3 A. No.  
 4 Q. Would you agree with your husband's testimony  
 5 yesterday that Hannah Crews did not participate actively  
 6 in the call with Blaine and you and your husband?  
 7 A. Yes.  
 8 Q. You are not aware as we sit here today that  
 9 Hannah Crews has ever contacted any third party about  
 10 anything related to your lawsuit, are you?  
 11 A. No.  
 12 Q. And you weren't aware of any statements at the  
 13 time that you filed this lawsuit where Hannah Crews  
 14 would be the person allegedly defaming either you or  
 15 your husband, are you?  
 16 A. I don't know.  
 17 Q. Well, when you filed this lawsuit in  
 18 November 2018 were you aware of any allegedly defamatory  
 19 communications by Hannah Crews?  
 20 A. Well, I mean, she lied to her husband.  
 21 Q. Okay. Were you aware of any defamatory  
 22 communications made by Hannah Crews to any third party,  
 23 not her husband or you or your husband, in November of  
 24 2018?  
 25 A. I'm not sure. I don't know.

Page 50

1 Q. In November of 2018 were you aware of any  
2 assault by Hannah Crews?  
3 A. Assault? No.  
4 Q. Okay. Would you lay out for me, Mrs. Galvan,  
5 in November 2018 what did you consider -- with respect  
6 to Mr. Blaine Crews's statements, what did you consider  
7 defamatory as to you?  
8 A. Well, I mean, defamatory to me would be the  
9 fact that he said that -- that I knew that he had  
10 manipulated -- that Richard had manipulated and seduced  
11 her in '07, and that was not true. That's not true.  
12 Q. Okay. And is it your position today that  
13 that's not true because your opinion is that your  
14 husband, Mr. Richard Galvan, did not manipulate or  
15 seduce but did have sex with Hannah Crews but not as a  
16 result of either manipulation or seduction? Is that  
17 your opinion today?  
18 A. Yes.  
19 Q. And was that your opinion in 2018?  
20 A. Yes.  
21 Q. You would agree with your husband's testimony  
22 that Mr. Blaine Crews never threatened you, your husband  
23 or your children with any imminent physical harm during  
24 his phone call with you; isn't that correct?  
25 A. Yes.

Page 51

1 Q. Did you understand -- I'm scrolling down past  
2 the Facts section of this original petition. Did you  
3 understand when you filed this lawsuit in November 2018  
4 that you and your husband were seeking a permanent  
5 injunction against both Blaine and Hannah Crews?  
6 A. I'm not sure. I don't recall.  
7 Q. Okay. Were the details regarding temporary  
8 restraining order, temporary injunction and permanent  
9 injunction, were the details of any of those kinds of  
10 relief ever explained to you prior to this lawsuit being  
11 filed?  
12 A. No.  
13 Q. By anyone?  
14 A. No.  
15 Q. Did you understand that you were seeking to  
16 curtail or enjoin the Crewses' personal freedom as a  
17 result of this lawsuit?  
18 A. No.  
19 Q. You did not understand that when it was filed?  
20 A. No.  
21 Q. With respect to causes of action, the first one  
22 listed here is assault. Do you see that in your  
23 lawsuit?  
24 A. Yes.  
25 Q. And it says, In addition, or in the alternative

Page 52

1 to all the other claims, Plaintiffs seek recovery under  
2 a theory of assault. Do you see that?  
3 A. Yes.  
4 Q. And going on from there it says, Specifically,  
5 Blaine Crews, intentionally or knowing, threatened  
6 Richard Galvan with imminent bodily injury which caused  
7 Plaintiff Richard Galvan injury. Do you see that?  
8 A. I do.  
9 Q. Now, your testimony just a few minutes ago was  
10 in the phone call that you were on, you agreed with your  
11 husband's testimony from yesterday that Mr. Crews never  
12 threatened you, your husband or your children with  
13 imminent bodily injury. Do you know why this threat was  
14 put into the lawsuit?  
15 A. No.  
16 Q. Is that, no, you do not?  
17 A. No.  
18 Q. You don't agree with that statement now, do  
19 you?  
20 A. No.  
21 Q. And if you had been asked about it in 2018, you  
22 wouldn't have agreed with it then, would you?  
23 A. I'm not sure.  
24 Q. In any case, the recitation in this lawsuit  
25 that Mr. Galvan was threatened with imminent bodily

Page 53

1 injury is incorrect?  
2 A. Yes.  
3 Q. With respect to the second cause of action,  
4 intentional infliction of emotional distress, when this  
5 lawsuit was filed did you have any understanding that  
6 you were seeking recovery under a theory of intentional  
7 infliction of emotional distress against the Crewses?  
8 A. Yes.  
9 Q. What did you -- what was your you understanding  
10 of what you were seeking to recover as a result of the  
11 intention infliction of emotional distress cause of  
12 action against the Crewses at the time this lawsuit was  
13 filed in 2018?  
14 A. I'm sorry. Can you ask that again?  
15 Q. Sure. When this lawsuit was filed in 2018 you  
16 filed a claim of intentional infliction of emotional  
17 distress, and you testified just a second ago that you  
18 understood that you had filed that claim. My question  
19 to you is, in 2018 what was your understanding of what  
20 you were seeking to recover under that cause of action?  
21 A. I didn't know. I don't know what I was seeking  
22 to recover.  
23 Q. Did you have an understanding when this lawsuit  
24 was filed that you and your husband were seeking over  
25 \$800,000 in money damages from the Crewses?

Page 54

1 A. No.

2 Q. Do you -- at the time in 2018 do you believe

3 either you or your husband had suffered \$800,000 in

4 monetary damages as a result of the Crewses' actions

5 alleged in your lawsuit?

6 A. I don't know.

7 Q. You don't know whether you did or not believe

8 that?

9 A. I really don't know how they arrived at that.

10 Q. Okay. But I'm asking from you personally.

11 You're a personal individual plaintiff in this lawsuit.

12 When it was filed in November 5th, 2018, do you believe

13 that Blaine Crews's actions had caused over \$800,000

14 worth of damage to you and your husband?

15 A. I don't know.

16 Q. Did you ever ask anybody about that --

17 A. No.

18 Q. -- back in 2018?

19 A. No.

20 Q. Did you make any attempt to calculate the

21 monetary damages you believed you had suffered when this

22 lawsuit was filed?

23 A. No.

24 Q. Do you know if your husband made any attempt to

25 calculate monetary damages that he had suffered when

Page 55

1 this lawsuit was filed?

2 A. No, I don't know how they arrived at that.

3 Q. You don't know who it was or how it happened?

4 A. No.

5 Q. Do you have any understanding now of why you

6 agreed with it then back in 2018?

7 A. No.

8 Q. When you read it -- did you read that in the

9 petition in 2018?

10 A. No.

11 Q. Okay. So you don't recall ever seeing the

12 monetary figures totaling \$835,000 back in 2018?

13 A. No, I don't.

14 Q. Is that because you didn't actually get to see

15 the full petition?

16 A. I don't know. I don't recall.

17 Q. As we sit here today do you recall whether you

18 saw every page of the petition that y'all filed in 2018?

19 A. No.

20 Q. You don't recall one way or the other?

21 A. No, I don't recall.

22 Q. Do you recall seeing any monetary damage

23 figures in 2018 when you -- in this lawsuit?

24 A. No.

25 Q. Have you kept any notes or records that you

Page 56

1 could reflect on to tell me what it is you reviewed in

2 2018 when this was filed?

3 MS. NIX: Objection; form.

4 THE WITNESS: No.

5 Q. (BY MR. CHAPMAN) I don't want to know

6 anything again that you've said to your lawyers, but did

7 you have any meetings with Mr. Bence or Mr. Young prior

8 to the filing of this lawsuit?

9 A. No.

10 Q. Did you have any communications with them

11 whatsoever?

12 A. I don't recall.

13 Q. In October of 2018 when this lawsuit was filed

14 what was your understanding of the specifics of what you

15 were trying to recover and why with respect to

16 intentional infliction of emotional distress?

17 A. I don't know all the specifications, all the

18 specifics. I don't know.

19 Q. Do you know why whoever it was that did it made

20 a big deal about there's no physical proof in your

21 pleadings in this lawsuit?

22 A. No.

23 Q. You would agree with me that just because

24 there's no physical proof doesn't mean something didn't

25 happen, correct?

Page 57

1 A. I don't know.

2 Q. You agree with me that you don't have to

3 have -- the lack of a physical proof doesn't negate that

4 something could have happened, correct?

5 A. I don't know.

6 Q. Okay. With respect to the next cause of

7 action, it's under a heading titled Defamation Per Se.

8 Do you see that heading?

9 A. Yes.

10 Q. Were you in the room yesterday when your

11 husband was going through this pleading with me and

12 talking about his defamation per se claim?

13 A. I don't know if I was here.

14 Q. Okay. Very good. What is your -- what was

15 your understanding in 2018 of what constituted

16 defamation, first of all?

17 A. I'm sorry. Can you ask that again?

18 Q. Sure. In 2018 when this lawsuit was filed,

19 what was your understanding of what constituted

20 defamation?

21 A. Well, to, you know, injure someone's

22 reputation, I guess, something that's untrue.

23 Q. Did you have an understanding that it required

24 something -- that a cause of action for defamation

25 required something to be untrue?



Page 58

1 A. Yes.

2 Q. Did you have an understanding that to defame

3 somebody you had to communicate something that was

4 untrue to a third party?

5 A. Yes.

6 Q. Yesterday your husband testified that what was

7 defaming in the communications by Blaine Crews was the

8 use of the phrase manipulated and seduced. Do you agree

9 with that testimony?

10 A. Yes.

11 Q. Is there anything else in the communications

12 that you heard on the phone call from Blaine Crews that

13 you consider to be defamatory?

14 A. He didn't manipulate or seduce her.

15 Q. Anything -- anything else?

16 A. In the phone call or just in general?

17 Q. With respect to my client, Blaine Crews's

18 communications, the ones that you personally heard,

19 other than manipulate -- seduced and manipulated or

20 manipulated and seduced, is there anything else in the

21 communications that you personally heard that you

22 believe to be defamatory?

23 A. Well, I mean, I don't believe he had -- you

24 know, he didn't have -- [unintelligible] -- any

25 position, you know, or he wasn't in any kind of position

Page 59

1 to make her to have sex with him.

2 Q. Okay. Did Mr. Blaine Crews in the phone call

3 say that your husband made her have sex with him?

4 A. That he made her? Say that again?

5 Q. Yeah. Did he say made her have sex with him --

6 A. No, he --

7 Q. -- in the phone call?

8 A. Blaine said that he manipulated her.

9 Q. Okay. He said manipulated and seduced was your

10 husband's testimony yesterday, and I think you've agreed

11 with that. That's correct, isn't it?

12 A. Yes.

13 Q. Okay. So I'm just trying to drill down in that

14 conversation that you had outside the movie theater was

15 there anything other than -- anything else said by my

16 client, Mr. Blaine Crews, other than manipulated and

17 seduced that you believe was defamatory in 2018 when

18 this lawsuit was filed?

19 A. No.

20 Q. Okay. Do you have an understanding -- did you

21 have an understanding in 2018 when this lawsuit was

22 filed what the phrase "per se" meant when it was added

23 after defamation?

24 A. No.

25 Q. Was that ever explained to you by anybody?

Page 60

1 A. No.

2 Q. Did you understand that you were seeking

3 monetary damages against the plaintiffs with respect to

4 alleged defamatory statements made by Blaine Crews?

5 A. No.

6 Q. Did you understand that you were seeking

7 hundreds of thousands of dollars in damages for

8 allegedly defamatory statements by my client, Blaine

9 Crews, in this lawsuit filed in November 2018?

10 A. No.

11 Q. Do you know why you agreed with this lawsuit

12 then at the time?

13 A. No, I don't know. I don't recall.

14 Q. With respect to Hannah Crews, you don't have

15 any testimony to give me that you believe she contacted

16 any third party and made a defamatory statement,

17 correct?

18 A. No, not that I -- not that I'm aware of.

19 Q. Okay. And you didn't back in 2018 when this

20 lawsuit was filed, correct?

21 A. That's correct.

22 MS. NIX: Mr. Chapman, I show we're almost

23 at an hour and a half. Can we take a five-minute break?

24 MR. CHAPMAN: Yeah, let's take -- let's

25 take five or six minutes. That's perfect. Thank you.

Page 61

1 (Recess from 11:25 to 11:37.)

2 Q. (BY MR. CHAPMAN) Ms. Galvan, have you

3 understood generally the questions that I've asked you

4 thus far?

5 A. Yes.

6 Q. Okay. We were talking about the defamation per

7 se action that was filed by you in November 2018 against

8 my clients, Blaine and Hannah Crews. It has been your

9 testimony that the defaming -- excuse me -- the defaming

10 statements by Blaine Crews, which were the sole basis of

11 this action, were the words manipulation and seduction.

12 With respect to those words, in 2018 when this lawsuit

13 was filed what did seduce or seduction mean to you?

14 A. Well, when you seduce someone, that's trying to

15 get them to do something -- I don't know -- seduce

16 meaning maybe entice them or trying to have them do

17 something they don't want to do, maybe doing something

18 against their will or seducing.

19 Q. You agree seducing generally connotes a

20 romantic or sexual subject matter?

21 A. I don't know.

22 Q. Can you think of the word seduce or seduction

23 being used for anything not linked to some sort of

24 romantic or sexual activity?

25 A. It could be toward something sexual, you know.

Page 62

1 Q. I mean, can you think of anything outside of a  
 2 romantic or sexual nature that the word seduce would  
 3 apply to?  
 4 A. No, just sexual.  
 5 Q. Okay. With respect to manipulate, in  
 6 November 2018 what did that mean to you?  
 7 A. Just seduce or manipulation and seduction?  
 8 Q. Well, what did manipulation and seduction mean  
 9 to you as a phrase?  
 10 A. Well, it means that, you know, trying to get  
 11 someone, you know -- like, you know, when you said that  
 12 about Richard, it was like if he was trying to get her  
 13 to do something that she didn't want to do, and he  
 14 didn't do that. He did not manipulate or seduce her.  
 15 He didn't try to use any type of position or any type  
 16 of -- you know, whatever she's claiming to get her to do  
 17 something against her will.  
 18 Q. Okay. That was your opinion when this lawsuit  
 19 was filed, correct?  
 20 A. Yes.  
 21 Q. When this lawsuit was filed, what was your  
 22 opinion generally about a pastor, priest, minister or  
 23 the like having sex with someone in his church?  
 24 A. Well, we were not pastors or leaders or  
 25 ministers at the church.

Page 63

1 Q. Objection; nonresponsive.  
 2 I'm asking in general. I'm not talking  
 3 about you or Mr. Galvan right now. I'm talking about in  
 4 November 2018 what was your opinion in general with  
 5 regard to priests, ministers and the like having sex  
 6 with people at their church?  
 7 A. I don't really have an opinion about that.  
 8 Q. You don't think it's good or bad one way or the  
 9 other?  
 10 A. I don't have an opinion.  
 11 Q. Okay. Were you aware at the time this lawsuit  
 12 was filed of any cases or scandals or anything of that  
 13 nature that had been in the news regarding priests,  
 14 ministers and the like having sex with people in their  
 15 congregations?  
 16 A. Yeah. I mean, there are, you know, Catholics,  
 17 you know. It was going on in the Catholic church,  
 18 priests.  
 19 Q. Some of that stuff has been all over the news  
 20 for years and years, correct?  
 21 A. That's correct.  
 22 Q. Were you aware in November 2018 that in the  
 23 state of Texas a person under the care of their minister  
 24 or pastor could not legally consent to sexual conduct  
 25 with that pastor or minister?

Page 64

1 A. No.  
 2 Q. Is that something you're aware of today?  
 3 A. No.  
 4 Q. Are you aware of that allegation ever being  
 5 made in this lawsuit?  
 6 A. No.  
 7 Q. Have you ever seen the statute regarding the  
 8 lack of consent in that situation?  
 9 A. No.  
 10 Q. Do you know if that statute was cited in my  
 11 brief to the Court of Appeals?  
 12 A. No.  
 13 Q. Do you know if that statute was used by the  
 14 Court of Appeals as a basis for their opinion in this  
 15 case?  
 16 A. No.  
 17 Q. Have you ever read the Court of Appeals opinion  
 18 in this case?  
 19 A. The Court of -- say that again?  
 20 Q. Have you ever read the 16-page opinion by the  
 21 Chief Justice of the 13th Court of Appeals issued in  
 22 your case?  
 23 A. It's been read to me but I have not read it.  
 24 Q. Do you understand that the Court of Appeals  
 25 determined that the facts in this case are that

Page 65

1 Ms. Hannah Linn, now Hannah Crews, could not legally  
 2 consent to sex with your husband in 2007?  
 3 MS. NIX: Objection; form.  
 4 THE WITNESS: No.  
 5 Q. (BY MR. CHAPMAN) Do you understand that the  
 6 court found that the great weight of the evidence in  
 7 this case is that my client, Hannah Crews, could not  
 8 have consented to sex with your husband in 2007?  
 9 MS. NIX: Objection; form.  
 10 Q. (BY MR. CHAPMAN) Are you aware of that at  
 11 this time?  
 12 A. No.  
 13 Q. Back in 2018 when this lawsuit was filed you  
 14 had no knowledge regarding consent laws between pastors  
 15 and people in their congregation or under their care,  
 16 did you?  
 17 A. No.  
 18 Q. And since the time this lawsuit was filed in  
 19 2018 is it fair to say no one has communicated on that  
 20 subject with you whatsoever?  
 21 A. No.  
 22 Q. Are you aware then the Court of Appeals issued  
 23 in October 2019 -- the court found that because of the  
 24 situation between Hannah Crews, then Hannah Linn, and  
 25 your husband, that conduct was as a matter of law a

Page 66

1 matter of concern to the public?  
 2 MS. NIX: Objection; form.  
 3 THE WITNESS: No.  
 4 MR. CHAPMAN: What's the basis?  
 5 MS. NIX: The basis would be facts not in  
 6 evidence and no personal knowledge.  
 7 MR. CHAPMAN: I asked her what she was  
 8 aware of.  
 9 Q. (BY MR. CHAPMAN) Are you aware that in  
 10 October 2019 the 13th Court of Appeals found as a matter  
 11 of law in this case that the sexual incident between  
 12 Hannah Crews and your husband was and is a matter of  
 13 public concern?  
 14 A. No.  
 15 Q. Has anyone ever told you that?  
 16 A. I don't recall.  
 17 Q. Has your husband ever told you that?  
 18 A. I don't recall.  
 19 Q. Going on in the petition, there's a claim for  
 20 public disclosure of private facts. Do you see that  
 21 there on the screen?  
 22 A. Yes.  
 23 Q. At the time this petition was filed in 2018 did  
 24 you have any understanding what the claim public  
 25 disclosure of private facts was about?

Page 67

1 A. I don't -- I'm not really sure. I don't  
 2 recall.  
 3 Q. Did you understand you were making a claim  
 4 against both Blaine and Hannah Crews for public  
 5 disclosure of private facts?  
 6 A. Yes, I guess.  
 7 Q. Scrolling down on this page five of the first  
 8 petition in this case, did you have an understanding in  
 9 2018 that you were asking the court to place a gag order  
 10 on both of my clients?  
 11 A. Yes.  
 12 Q. What in your mind in 2018 was the basis for the  
 13 requested gag order?  
 14 A. It was really at our lawyer's advice at the  
 15 time.  
 16 Q. You don't know factually what the basis for  
 17 that requested relief was, do you?  
 18 A. No.  
 19 Q. Going on to page six of the petition, did you  
 20 understand in 2018 when this lawsuit was filed that you  
 21 and your husband, Mr. Galvan, were seeking an award of  
 22 exemplary damages against my clients?  
 23 A. No.  
 24 Q. Did you understand what exemplary damages were?  
 25 A. No.

Page 68

1 Q. As we sit here today do you understand what  
 2 exemplary damages are?  
 3 A. No.  
 4 Q. Have you heard the term punitive damages?  
 5 A. I've heard the term before.  
 6 Q. Okay. If I tell you that exemplary damages are  
 7 often times referred to also as punitive damages, do you  
 8 have an understanding of what that concept is?  
 9 A. I have some understanding but I don't know the  
 10 details.  
 11 Q. Okay. If I said to you that exemplary or  
 12 punitive damages were damages that a party is seeking  
 13 not to recover from their own damages but simply to  
 14 punish a defendant, is that consistent with what you  
 15 might have thought about the concept of punitive damages  
 16 in 2018?  
 17 A. Yes.  
 18 Q. Did you understand in 2018 that you were  
 19 seeking this court to award money to you not for your  
 20 own damages but to punish Mr. and Mrs. Crews? Did you  
 21 understand that in 2018?  
 22 A. No.  
 23 Q. You did -- I'm going to scroll down to the  
 24 bottom of page six. You did understand that you and  
 25 your husband were seeking a restraining order against

Page 69

1 the Crewses?  
 2 A. Yes.  
 3 Q. What was your understanding of what you were  
 4 trying to restrain in 2018?  
 5 A. Well, I was really trying to get him from --  
 6 stop trying to hurt, you know, me, my family, my kids.  
 7 It was very frustrating. It was very emotional.  
 8 Q. Fair to say that you didn't want communications  
 9 about the sexual incident between Hannah and Richard to  
 10 be made public; is that correct?  
 11 A. No, that's not true.  
 12 Q. You didn't care about that at all?  
 13 A. Well, I want to say that it was their version  
 14 of the story. It was how it was being said, that he  
 15 manipulated and seduced her.  
 16 Q. Okay. In 2018 you understood that your husband  
 17 had had sex with Hannah Linn when she was 17 years old.  
 18 A. Yes.  
 19 Q. Is it your position that that information would  
 20 not have, to use the language in your petition,  
 21 mortified, embarrassed, damaged you in any way?  
 22 A. I'm not really sure.  
 23 Q. Did you understand in 2018 when this pleading  
 24 was filed that you and your husband were seeking to have  
 25 whatever fees were incurred by your attorneys to be paid

<p style="text-align: right;">Page 70</p> <p>1 by the Crewses?                  2 A. Yes.                  3 Q. Do you think you read this sentence that                  4 plaintiffs are entitled to reasonable and necessary                  5 attorneys' fees back in 2018?                  6 A. Yes.                  7 Q. You did read that section?                  8 A. Yes.                  9 Q. Did you read it in this petition?                  10 A. Yes, I think so.                  11 Q. I'm going to go down to the bottom of this                  12 page, paragraph A under Prayer, and it says, Actual and                  13 special damages of and from the Defendants in an amount                  14 no less than \$335,000 associated with Plaintiffs' claims                  15 of defamation, plus \$500,000 in damages associated with                  16 pain and suffering, is requested hereinabove, all in an                  17 amount within the jurisdictional limits of this court.                  18 Do you see that?                  19 A. Yes.                  20 Q. Earlier your testimony was that you didn't                  21 understand that you were asking for \$835,000 worth of                  22 damages in this lawsuit and that you said you didn't                  23 read that in the lawsuit. My question to you,                  24 Ms. Galvan, is if you read the attorneys' fees section                  25 above, why didn't you read to the bottom of the page?</p>	<p style="text-align: right;">Page 72</p> <p>1 A. Yes.                  2 Q. Do you know the notary Gloria Ibarra by any                  3 chance?                  4 A. Do I know her like personally or what do you                  5 mean do I know her?                  6 Q. Well, do you know -- do you know where you                  7 signed this, first of all, I guess?                  8 A. Yes.                  9 Q. Where did you sign this document?                  10 A. I don't remember.                  11 Q. You just said that you knew where you signed                  12 it. Are you changing that answer?                  13 A. I don't remember. Yeah. I don't remember.                  14 Q. Okay. So when you said you knew where you                  15 signed it, that was incorrect?                  16 A. Yeah, that's incorrect. I don't remember. I                  17 signed a lot of stuff.                  18 Q. Related to this lawsuit?                  19 A. No, I just mean in general. I'm sorry.                  20 Q. Okay. Do you remember going anywhere to sign                  21 documents related to this lawsuit in 2018, November                  22 2018?                  23 A. I don't recall.                  24 Q. Did you sign this at home?                  25 A. I don't recall.</p>
<p style="text-align: right;">Page 71</p> <p>1 A. I don't know.                  2 Q. You don't know?                  3 A. No.                  4 Q. Do you recognize the verification page that's                  5 now on the screen?                  6 A. Yes.                  7 Q. Is this a verification page for the Plaintiffs'                  8 Original Petition in this lawsuit?                  9 A. Yes.                  10 Q. Did you read the first paragraph of that that's                  11 in the quotes in the middle of the page that starts                  12 with, My name is Sonia Galvan?                  13 A. Okay.                  14 Q. That paragraph says, My name is Sonia Galvan.                  15 I've read the Plaintiffs' Original Petition and                  16 Application for Temporary Restraining Order, and the                  17 facts stated therein are within my personal knowledge                  18 and are true and correct. Did I read that correctly?                  19 A. Uh-huh. Yes.                  20 Q. And I'm going to go down here to the next page.                  21 Is that your signature on the second page of this                  22 verification?                  23 A. Yes.                  24 Q. And you signed that statement under oath on                  25 November 1st, 2018, correct?</p>	<p style="text-align: right;">Page 73</p> <p>1 Q. Is it possible you signed it at home?                  2 A. I don't know.                  3 Q. Your testimony here today under oath is you                  4 don't recall where you signed this verification of the                  5 lawsuit in any way?                  6 A. Yes, that's correct.                  7 Q. You don't know if you signed it at a law                  8 office, at your husband's office or at your home?                  9 A. I do not recall.                  10 Q. Do you recall providing a state-issued ID to                  11 the notary public to record in her notary book?                  12 A. No, I don't recall.                  13 Q. Do you recall ever doing that for anything in                  14 this lawsuit?                  15 A. No, I don't recall.                  16 Q. You don't think -- do you think you did or did                  17 not?                  18 A. I don't know.                  19 Q. Do you think it's more likely that you did                  20 provide an ID to the notary or that you did not?                  21 MS. NIX: Objection; form, Counsel. The                  22 witness has answered this question numerous times.                  23 THE WITNESS: I don't recall.                  24 Q. (BY MR. CHAPMAN) Do you remember what day --                  25 well, do you remember the circumstances under which you</p>

Page 74

1 reviewed the plaintiffs' petition? Do you remember  
 2 where you were?  
 3 A. No.  
 4 Q. Did you review it on a computer screen or did  
 5 you review a paper copy?  
 6 A. I don't know. I don't know.  
 7 Q. Did you review it at the same time as Richard  
 8 or at a different time?  
 9 A. I do not recall.  
 10 Q. Do you remember who asked you to review the  
 11 lawsuit?  
 12 A. No.  
 13 Q. Do you have any recollection of anybody asking  
 14 you to review your original petition in this case?  
 15 A. No.  
 16 Q. Would you agree with me that a lawsuit asking  
 17 for at least \$835,000 in economic damages is a serious  
 18 lawsuit?  
 19 MS. NIX: Objection; form.  
 20 THE WITNESS: Yes.  
 21 Q. (BY MR. CHAPMAN) If somebody sued you for  
 22 \$835,000, would you consider that to be a serious  
 23 matter?  
 24 MS. NIX: Objection; form.  
 25 THE WITNESS: Yes.

Page 75

1 Q. (BY MR. CHAPMAN) Do you think that's  
 2 something you would remember?  
 3 A. A lawsuit? Can you --  
 4 Q. Yeah. If somebody sued you for -- if somebody  
 5 sued you for nearly \$1,000,000, do you think that's  
 6 something you would keep a memory of when you received  
 7 it?  
 8 A. Yes.  
 9 Q. But in this lawsuit, seeking nearly a million  
 10 dollars from my clients at least, you don't have any  
 11 recollection of reviewing any of the documents about it,  
 12 do you?  
 13 A. I do not remember ever seeing the numbers.  
 14 Q. You don't remember seeing the notary?  
 15 A. No, the numbers. Not the notary.  
 16 Q. Okay. You don't remember -- okay. I  
 17 understand that. You don't remember seeing the notary  
 18 for your affidavit, do you?  
 19 A. I don't -- I don't recall.  
 20 Q. Do you remember providing the information --  
 21 I've now scrolled back up to be clear, the first page of  
 22 your verification and affidavit in your original  
 23 petition. Do you remember providing the information in  
 24 this verification and affidavit to anyone?  
 25 A. To my -- I believe I gave that information to

Page 76

1 my attorney.  
 2 Q. Earlier you testified that you don't recall  
 3 ever meeting with your attorney before this was filed.  
 4 How did you give him that information?  
 5 A. I don't remember. I don't remember how I gave  
 6 it to him.  
 7 Q. Do you remember when?  
 8 A. Shortly sometime after the phone call.  
 9 Q. Did you go to -- you're talking about Mr. Bence  
 10 now. Did you go to his office?  
 11 A. I really don't remember.  
 12 Q. Did you go to Mr. Bence's office at any time  
 13 before this petition was filed?  
 14 A. I might have. I don't recall.  
 15 Q. In the course of this lawsuit did you receive  
 16 any communications directly from Mr. Bence?  
 17 A. Yeah, I believe so.  
 18 Q. Were those sent to you via an email to your own  
 19 email or to an email for you and your husband both?  
 20 A. I believe it might have been my husband's  
 21 email. I don't -- I don't recall. I don't recall.  
 22 Q. Okay. I'm going to ask you to read the second  
 23 paragraph on the first page of your affidavit --  
 24 MS. NIX: Mr. Chapman?  
 25 Q. (BY MR. CHAPMAN) -- on the screen now.

Page 77

1 MS. NIX: I apologize for interrupting,  
 2 Mr. Chapman. We're at 12:00 o'clock. Were we going to  
 3 break and when would it be convenient to do so?  
 4 MR. CHAPMAN: Yeah, let me get through this  
 5 affidavit. Maybe like five minutes or so, ten minutes.  
 6 MS. NIX: All right.  
 7 Q. (BY MR. CHAPMAN) Okay. Ms. Galvan, go ahead  
 8 and take a look at this paragraph that's up on the  
 9 screen. It's the second paragraph of your affidavit in  
 10 support of the original petition.  
 11 A. Okay.  
 12 Q. Is there anything in that paragraph that you  
 13 disagree with now?  
 14 A. No.  
 15 Q. Did you ever receive a file-marked copy of your  
 16 petition and application for injunctive relief once it  
 17 was filed with the court in Cameron County, Texas?  
 18 A. Is that what this is called?  
 19 Q. Yes.  
 20 A. No.  
 21 Q. Okay. I scrolled down now to the verification  
 22 of Mr. Richard Galvan that I went over with him  
 23 yesterday. Did you participate in any way in preparing  
 24 his verification and affidavit in support of this  
 25 original petition?

Page 78

1 A. No.

2 MR. CHAPMAN: All right. Let's take a

3 break, folks.

4 MS. NIX: And come back at what time?

5 MR. CHAPMAN: 12:35.

6 MS. NIX: 12:35?

7 MR. CHAPMAN: Yeah.

8 (Lunch recess from 12:05 to 12:43.)

9 Q. (BY MR. CHAPMAN) All right. Let's get back to

10 starting. We've come back from a lunch break.

11 Ms. Galvan, I was asking you about things related to

12 your original petition from 2018 in this case before we

13 broke for lunch. With respect to your testimony about

14 this petition, is there anything after the lunch break

15 that you want to change?

16 A. No, I don't think so.

17 Q. Okay. We've gone through this original

18 petition that you and your husband both filed in

19 November 5th, 2018, and reviewed it in pretty good

20 detail. I want to ask you in general in 2018 did you,

21 Sonia Galvan, want to file this lawsuit?

22 A. Yes.

23 Q. And you wanted to do that independently of what

24 your husband's opinion was; is that correct?

25 A. We both wanted to.

Page 79

1 Q. Okay. Nobody -- nobody made you or coerced you

2 into filing this thing, correct?

3 A. That's correct.

4 Q. And you understood back at the time that you

5 didn't have to be a party to it?

6 A. Yes, I did.

7 Q. And you understood back at the time that you

8 didn't have to execute a verification and affidavit in

9 support of what you were asking for?

10 A. I'm sorry. Can you ask that again?

11 Q. Yeah. You understood at the time that you

12 didn't have to sign off on a sworn pleading, a

13 verification and affidavit in support of this thing. No

14 one made you do that, did they?

15 A. No. The attorneys are the one who did.

16 Q. That was your voluntary act to swear that

17 you -- everything in that petition was true and correct

18 and within your personal knowledge, wasn't it?

19 A. Yes.

20 Q. Why did you want to file this lawsuit back in

21 2018?

22 MS. NIX: Objection; form. Asked and

23 answered.

24 THE WITNESS: Do I answer?

25 MR. CHAPMAN: Go ahead.

Page 80

1 MS. NIX: Yeah.

2 THE WITNESS: Oh, I'm sorry. Wanted to

3 file? Because, you know, we felt threatened by what

4 Blaine had said, because he had accused Richard of

5 manipulating and seducing, and then he made threats

6 towards Richard and towards me, towards my children, and

7 so because of those threats, you know, I did not feel

8 safe.

9 Q. (BY MR. CHAPMAN) Okay. Move along now to --

10 this was Exhibit 3 to Richard's deposition. It will be

11 Exhibit 3 to yours. Let me scroll up here. It's a

12 cover sheet from Bence and Associates to me, dated

13 February 8th, 2019. This is a copy of Plaintiffs' First

14 Amended Original Petition and Application for Injunctive

15 Relief. Do you see that document that's on the screen

16 now?

17 A. Yes.

18 Q. Did you have any active participation in

19 amending your original petition to create this amended

20 original petition?

21 A. No.

22 Q. Okay. Gosh. Let me go back one more time to

23 the original petition. I'm going to ask you to look

24 over the facts here and tell me when you're -- tell me

25 when you're done and we'll move along.

Page 81

1 A. Okay.

2 Q. I'm going to go down now to one more -- sorry

3 to this again but let me go down. This is the

4 conclusion of your Facts section. If you just want to

5 glance over that right quick again, please.

6 A. Okay.

7 Q. Okay. I've showed you the page and a half to

8 two pages that are the facts, factual assertions, in

9 your original petition, Mrs. Galvan. There is not any

10 statement in your original petition that the things said

11 by my client, Mr. Blaine Crews, were false, is there?

12 A. I'm sorry. I missed that. That what? I

13 missed the one word. I couldn't hear it.

14 Q. Sure. Let me rephrase it or just repeat it.

15 We looked over the facts, the entire section of the

16 factual assertions supporting your lawsuit filed on

17 November 5th, 2018, and in the factual assertions

18 supporting the lawsuit there is no statement from either

19 you or Mr. Galvan, the plaintiffs in the lawsuit, that

20 the things said by Blaine Crews were false, is there?

21 A. So you're asking if there's anything here that

22 is false?

23 MS. NIX: No.

24 Q. (BY MR. CHAPMAN) No, that's not what I'm

25 asking. I'm asking -- I'm asking the following

Page 82

1 question. You and your husband filed this lawsuit.  
 2 These are the facts that you cited to support your  
 3 lawsuit, and neither you nor your husband in your  
 4 lawsuit stated that my client's statements, Mr. Blaine  
 5 Crews's statements, were false.  
 6 A. Oh, I get what you're saying. Okay.  
 7 Q. That's not in here, is it?  
 8 A. I think -- I thought we did say that they were  
 9 false. Can you scroll up a little more?  
 10 Q. Yeah, sure.  
 11 MS. NIX: Okay.  
 12 THE WITNESS: I don't know. Maybe it's  
 13 further down? Can you go up? No?  
 14 Q. (BY MR. CHAPMAN) I'll go through the facts.  
 15 I'm asking -- I'm asking about the facts cited to  
 16 support your lawsuit. There's no statement that  
 17 Mr. Blaine Crews's communications were false, is there?  
 18 A. I don't think -- I don't think they're in the  
 19 original petition because I -- I don't think that  
 20 they're in the original.  
 21 Q. Ms. Galvan, if you as a plaintiff are filing a  
 22 lawsuit and did file a lawsuit in 2018 about allegedly  
 23 false statements, why did you not identify the false  
 24 statements in the lawsuit that you filed?  
 25 A. I don't know what the attorneys --

Page 83

1 Q. Do you think that would be something important  
 2 to do in a lawsuit about false statements?  
 3 A. I don't know.  
 4 Q. Okay. I want to move along back to the amended  
 5 petition. You didn't participate -- I think you just  
 6 testified that you didn't participate in redrafting and  
 7 amending the petition in any way, correct?  
 8 A. Yeah, that's correct.  
 9 Q. Okay. Now, here we go. In the Facts section  
 10 of this one it contains a modification of four words.  
 11 I'm going to read it to you. Immediately thereafter  
 12 Blaine Crews texted Plaintiff Sonia Galvan and claimed  
 13 that Plaintiff Richard Galvan seduced and manipulated  
 14 Defendant Hannah Crews in 2007. These allegations are  
 15 false. Do you see that?  
 16 A. Yes, I see it.  
 17 Q. And that's an addition in your first amended  
 18 petition filed about three months after your original  
 19 lawsuit, correct?  
 20 A. Yes.  
 21 Q. I'm going to scroll down here and skip around.  
 22 With respect to the prayer in the first amended  
 23 petition, did you understand in February 2019 that you  
 24 and your husband were still asking for over \$835,000 in  
 25 damages?

Page 84

1 A. No.  
 2 Q. Had you suffered \$835,000 in damages by that  
 3 time?  
 4 A. I don't know. I'm not aware.  
 5 Q. That first amended petition is supported by an  
 6 affidavit of your husband, Mr. Richard Galvan, and I  
 7 think you probably heard me talk about it with him  
 8 yesterday; is that right?  
 9 A. Yes, I think so.  
 10 Q. You didn't participate in him -- in crafting  
 11 his affidavit for this amended pleading, correct?  
 12 A. No.  
 13 Q. You wouldn't be able to comment about whatever  
 14 he put in the amended pleading then -- amended affidavit  
 15 then or why he --  
 16 A. I'm sorry.  
 17 Q. -- put it in there, correct?  
 18 A. I'm sorry. Say that first part again. I  
 19 wouldn't what?  
 20 Q. Yeah. Would you -- you wouldn't -- if you  
 21 didn't participate, you wouldn't have any ability to  
 22 comment on why things were added to this amended  
 23 affidavit that weren't in the first one?  
 24 A. No. No.  
 25 Q. And you did not file an affidavit in support of

Page 85

1 the first amended petition, or did you? Yeah, you did.  
 2 Do you remember executing this affidavit and  
 3 verification in February 2019?  
 4 A. I don't know.  
 5 Q. Okay. Is that your signature on the page  
 6 that's up now, page two?  
 7 A. Yeah, that's my signature.  
 8 Q. Okay. Who's Claudia Hernandez?  
 9 A. The notary.  
 10 Q. Yeah. Do you know -- do you know Ms. Hernandez  
 11 personally in any capacity?  
 12 A. I don't know her personally.  
 13 Q. Okay. Do you recall where you executed this  
 14 affidavit in February of 2019?  
 15 A. I do not recall the location of where it was  
 16 notarized, the notary.  
 17 Q. Do you know if you signed it at your house?  
 18 A. No, I don't recall.  
 19 Q. Do you know if you were shown a copy of the  
 20 first amended petition and read through it before you  
 21 signed this affidavit in February 2018 -- '19?  
 22 A. I don't recall.  
 23 Q. Okay. I'm going to ask you to read -- well,  
 24 the first paragraph of this is, My name is Sonia Galvan.  
 25 I read the First Amended Original Petition and

Page 86

1 Application for Temporary Restraining Order, Plaintiffs'  
 2 Response to Defendants' Motion to Dismiss per Chapter --  
 3 CPRC Chapter 27 and Motion to Transfer Venue, and the  
 4 facts stated therein are within my personal knowledge  
 5 and are true and correct. Do you see that sentence?  
 6 A. I do see that.  
 7 Q. It was your testimony earlier this morning that  
 8 you didn't ever receive any -- review any motions filed  
 9 in this case. You hadn't reviewed any motion to dismiss  
 10 when you signed this affidavit, had you?  
 11 A. Motion to dismiss. I don't know.  
 12 Q. And you hadn't reviewed a motion to transfer  
 13 venue when you signed this affidavit, had you,  
 14 Ms. Galvan?  
 15 A. Ask me that question again.  
 16 Q. I said you hadn't reviewed the motion to  
 17 transfer venue when you signed this affidavit, had you?  
 18 A. I might have. I don't recall.  
 19 Q. Okay. You don't recall one way or the other?  
 20 A. Correct.  
 21 Q. When it says, Plaintiffs' Response to  
 22 Defendants' Motion to Dismiss per CPRC Chapter 27, do  
 23 you see that?  
 24 A. I do.  
 25 Q. Okay. Do you have any recollection -- you are

Page 87

1 the plaintiff in this lawsuit, and it's referencing your  
 2 response to a motion to dismiss. Do you have any  
 3 recollection of what was said in that response that you  
 4 say you read in this affidavit?  
 5 A. No, I don't.  
 6 Q. Do you have any recollection of what was said  
 7 in Plaintiffs' Response to Motion to Transfer Venue?  
 8 A. No.  
 9 Q. Do you have any understanding as we sit here  
 10 today that your attorneys did not file your response to  
 11 the motion to transfer venue in a timely manner and had  
 12 to request relief from the court for the court to  
 13 consider their response?  
 14 MS. NIX: Objection; form.  
 15 MR. CHAPMAN: What's the basis?  
 16 MS. NIX: Legal opinion. Legal question.  
 17 MR. CHAPMAN: I asked her if she had  
 18 knowledge of that.  
 19 THE WITNESS: I don't recall.  
 20 Q. (BY MR. CHAPMAN) Okay. But you can't tell me  
 21 as we sit here today any of the things argued in either  
 22 one of your responses to the motion to dismiss or the  
 23 motion to transfer venue, correct?  
 24 A. No. That's correct.  
 25 Q. Okay. If you would, read the second paragraph

Page 88

1 of your affidavit, and I can't get it all but we'll  
 2 scroll down. Let me know when you're ready to scroll  
 3 down to the next page.  
 4 A. Okay. I'm done with that first part.  
 5 Q. All right. You got a couple more -- a few more  
 6 lines on this page.  
 7 A. Okay. Okay.  
 8 Q. Okay. In this affidavit from February 2019 you  
 9 didn't swear -- you did not swear under oath that Blaine  
 10 Crews's statements were false or untrue, did you?  
 11 A. I did not swear under oath? Can you elaborate?  
 12 What do you mean by swear under oath?  
 13 Q. Yeah. Your affidavit is sworn under oath. You  
 14 understand that. Signed before a notary, correct?  
 15 A. Said they were false. No.  
 16 Q. There's no -- there's no statement by you that  
 17 those -- that those statements by Mr. Crews were false  
 18 in this affidavit, correct?  
 19 A. Correct.  
 20 Q. Okay. I'm going to go back up to your  
 21 husband's affidavit supporting the amended petition, and  
 22 down in the second sentence of the page that's now on  
 23 the screen, the second paragraph of Richard Galvan's  
 24 affidavit, it reads, During the conversation Blaine  
 25 Crews claimed in 2007 that I manipulated and seduced

Page 89

1 Hannah Crews. This is false. Do you see that language?  
 2 A. I do.  
 3 Q. My question to you, Ms. Galvan, is why did your  
 4 husband swear that that was false but you did not?  
 5 A. I don't know.  
 6 Q. Did you refuse to swear that was false at the  
 7 time of this amended pleading?  
 8 A. No.  
 9 Q. You don't know why that language wasn't  
 10 included in your affidavit, do you, as we set here  
 11 today?  
 12 A. No. It had to have been an error. It was an  
 13 error.  
 14 Q. Do you recall -- at the time that this first  
 15 amended petition was filed do you recall seeing the  
 16 numbers for the damages you were seeking?  
 17 A. No.  
 18 Q. All right. I'm going to move along here to  
 19 Richard Galvan's Exhibit -- what is this? -- 4, to  
 20 Mr. Galvan's Deposition Exhibit 4. It's an Affidavit of  
 21 Hannah Crews in Support of Defendants' Motion to  
 22 Dismiss. Do you see that?  
 23 A. Yes.  
 24 Q. When is the first time that you read this  
 25 affidavit of Hannah Crews, Mrs. Galvan?



Page 90

1 A. I don't remember.  
 2 Q. Had you read it at any time prior to your  
 3 husband's deposition testimony yesterday?  
 4 A. I don't -- I don't know. I don't recall.  
 5 Q. I'm going to ask you to read page one of the  
 6 affidavit. Let me know when you're ready.  
 7 A. Okay.  
 8 Q. I'm going to ask you to read paragraphs four,  
 9 five and six on the second page of Hannah Crews's  
 10 affidavit, and let me know when you're ready for me to  
 11 scroll down.  
 12 A. Can you scroll up just a little bit? Just a  
 13 little bit.  
 14 Q. Sure. Is that better? Is that better?  
 15 A. Yes. Okay.  
 16 Q. Okay. I'm going to get you to paragraphs six  
 17 and seven. Have you read six? Read seven. Then we'll  
 18 moved down when we get to -- you get down to seven.  
 19 A. Okay. Okay.  
 20 Q. And let me know when you're ready to scroll  
 21 down from the top of the page to paragraph ten and I'll  
 22 scroll down.  
 23 MR. CHAPMAN: Did we lose the deponents?  
 24 COURT REPORTER: It looks like we might  
 25 have. There they are.

Page 91

1 MS. NIX: I'm sorry. Mr. Chapman, can you  
 2 hear us?  
 3 MR. CHAPMAN: Yeah.  
 4 THE WITNESS: We completely lost internet  
 5 access.  
 6 Q. (BY MR. CHAPMAN) Okay. Did you get through  
 7 paragraph ten, Ms. Galvan?  
 8 A. Yes. Yes, I did.  
 9 Q. Okay. I've got paragraph eleven, twelve and 13  
 10 up there. I'm going to ask you to take a look at those  
 11 as well.  
 12 A. Okay. Can you go up to 13?  
 13 Q. Sure. Do you want me to raise it up?  
 14 A. Yes, please.  
 15 Q. Okay. Can you see 13 now?  
 16 A. Yes. But -- okay. Can you scroll up a little  
 17 more?  
 18 Q. Yeah. Have you gotten through paragraph 13?  
 19 A. Yes. Yes, uh-huh.  
 20 Q. Okay. I think we're good then for right now  
 21 anyway.  
 22 A. Okay.  
 23 Q. You looked through the affidavit, at least  
 24 through paragraph 13 of the affidavit now, Ms. Galvan?  
 25 A. Uh-huh.

Page 92

1 Q. Have you ever read Hannah Crews's direct  
 2 statement about her interactions with Richard Galvan  
 3 before now?  
 4 A. I don't recall I read through all of them.  
 5 Some of them.  
 6 Q. Do you know -- I will submit to you this  
 7 affidavit was filed in February of 2019 in support of  
 8 our motion to dismiss. Do you know why it is that your  
 9 husband did not file any testimony or any affidavit  
 10 telling the court in this case that the things that  
 11 Hannah says there in this affidavit are incorrect?  
 12 A. No, I don't know.  
 13 Q. You didn't file any affidavit saying the things  
 14 Hannah was saying are incorrect, did you?  
 15 A. No.  
 16 Q. Is there a reason why you didn't do that?  
 17 A. I just relied on my attorneys.  
 18 Q. Mr. Galvan, the day before his deposition two  
 19 days ago on the 13th, filed some additional supplemental  
 20 discovery responses where he goes through Hannah's  
 21 affidavit and attempted to tell me what he believes to  
 22 be incorrect in the affidavit. You did not do that or  
 23 have not done that, have you?  
 24 A. I'm sorry. Can you ask that question again?  
 25 Q. Yeah. You haven't -- you haven't made any

Page 93

1 attempt to go through Hannah's affidavit and send a  
 2 supplemental discovery response indicating what you  
 3 believe to be inaccurate or incorrect about Hannah's  
 4 affidavit, have you?  
 5 A. No, I have not.  
 6 Q. Okay. Is there a reason why you didn't do that  
 7 and your husband did?  
 8 MS. NIX: Objection; form.  
 9 THE WITNESS: I don't know.  
 10 Q. (BY MR. CHAPMAN) Just a second. Is there any  
 11 particular reason why you haven't filed supplemental  
 12 discovery responses and your husband has, to your  
 13 knowledge?  
 14 A. No.  
 15 Q. All right. In general when we were talking  
 16 about the incident with Richard and Hannah, your  
 17 testimony has been that you learned about it in 2007.  
 18 Do you remember when in 2007?  
 19 A. I'm sorry. It buffered just a little bit. You  
 20 said --  
 21 Q. Okay. This Richard -- this incident between  
 22 Richard and Hannah, do you -- you said you were told  
 23 about it in 2007. Do you remember when you were told  
 24 about it?  
 25 A. No, not when. It was around 2007, the fall or

Page 94

1 something.  
 2 Q. Okay. Was it Richard that told you about it?  
 3 A. Yes.  
 4 Q. Have you had any conversations with anyone  
 5 other than Richard about that incident between Richard  
 6 and Hannah?  
 7 A. No.  
 8 Q. Did you ever talk to Hannah about it?  
 9 A. No.  
 10 Q. Did you ever talk to Hannah's mother, Starla,  
 11 about it?  
 12 A. No.  
 13 Q. Did you ever talk to Hannah's father about it?  
 14 A. No.  
 15 Q. Have you ever talked to anybody else about that  
 16 incident?  
 17 A. No.  
 18 Q. Is 100 percent of the information that you have  
 19 about that incident then coming from Mr. Galvan?  
 20 A. Oh, yes.  
 21 Q. So when you testify in this matter that you  
 22 don't believe there was manipulation and seduction,  
 23 that's based on what Mr. Galvan told to you, correct?  
 24 A. Yes.  
 25 Q. Not anything else, correct?

Page 95

1 A. That's correct.  
 2 Q. Since 2007 -- I don't know if I did my time  
 3 frame correctly. Just to clarify, since 2007 you  
 4 haven't talked to anybody about this Hannah and Richard  
 5 incident, correct?  
 6 A. That's correct.  
 7 Q. Okay. Were you in the room yesterday when  
 8 Mr. Galvan was talking about the events in 2007 with  
 9 Hannah?  
 10 A. I'm sorry. Ask that again. Was I in the room?  
 11 Q. Yeah. Were you in the deposition room  
 12 listening when Mr. Galvan was going over Hannah's  
 13 affidavit and telling me what he agreed with and didn't  
 14 agree with yesterday?  
 15 A. Yes, but I did step out of the room a few  
 16 times, so --  
 17 Q. Understood.  
 18 A. Okay.  
 19 Q. Were you in the room for the testimony given by  
 20 your husband in which he recounted advances made by  
 21 Hannah on him?  
 22 A. Yes.  
 23 Q. Okay. He recounted there were three times that  
 24 he turned Hannah away and the fourth time he did not.  
 25 With respect to the first time, he talked about Hannah

Page 96

1 making a statement about having a dragon inside her.  
 2 Had you ever heard anything like that before yesterday?  
 3 A. Yes.  
 4 Q. When did you first hear that type of statement  
 5 from Hannah or that Hannah said that type of statement?  
 6 A. In about 2018.  
 7 Q. Okay. That wasn't something that Mr. Galvan  
 8 told you back in 2007?  
 9 A. No.  
 10 Q. Did he tell you about the three times that he  
 11 says he turned Hannah down back in 2007?  
 12 A. No. I don't recall, no.  
 13 Q. Okay. With respect to the second time that  
 14 Hannah made an advance on Mr. Galvan, his testimony  
 15 yesterday, and he told her to leave or to go away, had  
 16 you heard that before yesterday?  
 17 A. Yes.  
 18 Q. Was that in 2018 as well?  
 19 A. Yes.  
 20 Q. Incidentally, how tall is your husband?  
 21 A. I don't know. Maybe close to six.  
 22 Q. Six feet?  
 23 A. Uh-huh.  
 24 Q. Do you know how much he weighs, give or take?  
 25 A. I don't know. Maybe like 190 or something.

Page 97

1 I'm not sure. 185. I'm not really sure.  
 2 Q. Okay. This is a lot better than me asking him  
 3 those questions about you, which I would never do.  
 4 A. Uh-huh.  
 5 Q. Thank you.  
 6 MS. NIX: Objection; side-bar.  
 7 MR. CHAPMAN: I'm sorry. What?  
 8 MS. NIX: Objection; side-bar.  
 9 MR. CHAPMAN: Okay. I gotcha. Okay.  
 10 Q. (BY MR. CHAPMAN) With respect to the third  
 11 incident that Mr. Galvan recounted yesterday where he  
 12 says he refused Hannah's advances but that she kissed  
 13 him --  
 14 A. Uh-huh.  
 15 Q. -- had you heard the story of that incident as  
 16 recounted by Mr. Galvan before yesterday?  
 17 A. Yes.  
 18 Q. Was that also in 2018?  
 19 A. Yes.  
 20 Q. Okay. You didn't hear that incident, about  
 21 that incident, in 2007, did you?  
 22 A. No.  
 23 Q. Okay. With respect to the fourth interaction  
 24 between Mr. Galvan and Hannah that he recounted  
 25 yesterday that preceded them going to the La Quinta

Page 98

1 Hotel in Mercedes, Texas, had you heard a recounting of  
 2 that incident as given by Mr. Galvan before yesterday?  
 3 A. Yes.  
 4 Q. Was that in 2018 as well?  
 5 A. Yes.  
 6 Q. And you didn't hear about that in 2007?  
 7 A. No.  
 8 Q. Did Mr. Galvan in 2018 tell you that Hannah  
 9 Linn had pushed him down on a couch?  
 10 A. I'm sorry. Ask that again?  
 11 Q. Yeah. Back in 2018 when he was talking about  
 12 this fourth incident did Mr. Galvan tell you that Hannah  
 13 Linn had pushed him down on a couch in his office?  
 14 A. Yes.  
 15 Q. Okay. You knew Hannah Linn back at the time as  
 16 friends of the family, the Linn family, correct?  
 17 A. Correct.  
 18 Q. How tall is Hannah? How tall was Hannah Linn  
 19 back then? Do you have any idea?  
 20 A. No.  
 21 Q. Was she taller than five and a half feet?  
 22 A. I don't know.  
 23 Q. How tall are you?  
 24 A. About five four and a half.  
 25 Q. Was Hannah Linn as tall as you were?

Page 99

1 A. Maybe.  
 2 Q. Okay. Do you have any understanding how a five  
 3 two high school junior or senior is going to push down  
 4 your 190-pound six-pound husband in his office? Do you  
 5 have any understanding about how that could happen at  
 6 all?  
 7 A. Yeah, I think that can happen.  
 8 Q. Okay. So with regard to your husband's account  
 9 of those three incidents where he refused Hannah Linn  
 10 and the fourth incident where he did not ultimately, you  
 11 don't have any disagreement with anything that he says  
 12 about it, correct?  
 13 A. That's correct.  
 14 MS. NIX: Objection; form.  
 15 Q. (BY MR. CHAPMAN) Do you have anything that  
 16 you disagree with from the way that he told it  
 17 yesterday?  
 18 A. No.  
 19 Q. But you haven't -- you haven't done anything to  
 20 ask anybody else about it, correct?  
 21 A. No.  
 22 Q. Was Hannah Linn working in the summer at  
 23 Richard's office back in 2007, to your knowledge?  
 24 A. Not to my knowledge.  
 25 Q. Do you have any reason to dispute her statement

Page 100

1 that she was?  
 2 A. I don't recall.  
 3 Q. Do you recall ever paying her any money for  
 4 work done for y'all, any of y'all's companies?  
 5 A. No, I do not recall giving her any money.  
 6 Q. Okay. Do you know if she was regularly a  
 7 visitor to that office in 2007?  
 8 A. Yes.  
 9 Q. Was she regularly a visitor to that office in  
 10 2007?  
 11 A. Yes.  
 12 Q. Did you know that back in 2007?  
 13 A. Yes.  
 14 Q. And back in 2007 what did you think she was  
 15 doing coming to the office regularly?  
 16 A. I'm not really sure.  
 17 Q. Had you or Mr. Galvan hired other people  
 18 Hannah's age to do work for y'all's companies back  
 19 around that time?  
 20 A. I don't really remember.  
 21 Q. With respect to the -- Mr. Galvan's account of  
 22 what happened at the La Quinta, you don't have any  
 23 additional information one way or the other about that  
 24 incident at all, do you?  
 25 A. No.

Page 101

1 Q. And back in 2007, your family and the Linns,  
 2 you were friends with that family, correct?  
 3 A. Yes.  
 4 Q. And you socialized with them, correct?  
 5 A. Yes, just mostly at church.  
 6 Q. Okay. And was Hannah involved in the events  
 7 that you participated in with respect to the mission  
 8 trips?  
 9 A. And the fundraising and things like that?  
 10 Q. Yes.  
 11 A. Yes, she had some. Uh-huh.  
 12 Q. Okay. And did she go on a mission trip with  
 13 y'all in October or somewhere around that time, November  
 14 of 2007?  
 15 A. No. There was -- I don't think we went on a  
 16 mission trip ever in the fall.  
 17 Q. You don't recall going on a mission trip for  
 18 North Way Bible Church sometime in the fall of 2007?  
 19 A. 2007? No.  
 20 Q. Okay. Yesterday your husband, Mr. Galvan,  
 21 testified that he led mission trips in 2004, 2006, 2007  
 22 and 2008. With respect to that testimony, do you know  
 23 when the North Way Bible Church mission trip in 2007 did  
 24 occur?  
 25 A. They were usually in the summer after school

Page 102

1 was out.  
 2 Q. Okay. Do you remember where you went that  
 3 year?  
 4 A. I personally went on one trip in 2004 to  
 5 Aldana, and I did not -- I don't remember where they  
 6 went in 2000-- well, did you say '07?  
 7 Q. Yes.  
 8 A. Maybe Agua Dulce or -- I don't know. I don't  
 9 know. I forget the names of the place.  
 10 Q. Okay. You didn't go in 2007, correct?  
 11 A. No.  
 12 Q. At the time of the 2007 mission trip that  
 13 Richard went on, did you have any knowledge when he left  
 14 to go on that trip about things that might have happened  
 15 between him and Hannah?  
 16 A. No. I don't think so, no. 2007 mission trip.  
 17 You mean 2000-- there was -- 2007. It was -- that 2007  
 18 is -- that mission trip is -- was before the incident.  
 19 Q. Okay. With respect to the 2008 mission trip,  
 20 did Hannah go on that trip with your husband?  
 21 A. Yes.  
 22 Q. And by that point you knew what had happened  
 23 between Hannah and your husband?  
 24 A. Yes.  
 25 Q. Did you voice any objection to your husband

Page 103

1 about going on that trip?  
 2 A. No, there was a lot of other parents, adults  
 3 and youth.  
 4 Q. Okay. Did you have any knowledge of any  
 5 contact that Mr. Galvan made with Hannah after this  
 6 incident in August 2007?  
 7 A. I'm sorry. Can you ask that again one more  
 8 time?  
 9 Q. Yeah, sure. I might have phrased it poorly.  
 10 After the incident in August 2007 between Richard and  
 11 Hannah, do you know whether your husband had any  
 12 communications with Hannah beyond that?  
 13 A. No.  
 14 Q. You don't know one way or the other, correct?  
 15 A. No, not to my knowledge.  
 16 Q. Okay. He didn't share any of those with you?  
 17 A. No. I mean --  
 18 Q. Okay. And you never communicated with Hannah  
 19 about that incident one way or the other, correct?  
 20 A. No.  
 21 Q. Okay. With respect to Hannah's discussion in  
 22 her affidavit of Mr. Galvan coming to see her in  
 23 San Antonio when she was a freshman in college, do you  
 24 have any knowledge about that one way or the other?  
 25 A. I'm sorry. Can you say that again?

Page 104

1 Q. Sure. With respect to Hannah's recounting of  
 2 Mr. Galvan coming to see her at Trinity University when  
 3 she was a freshman in college, do you have any knowledge  
 4 about that -- that one way or the other?  
 5 A. No, I don't believe it's true.  
 6 Q. Okay. Is the basis for you saying that it's  
 7 not true simply that Mr. Galvan told you it wasn't true?  
 8 A. Yes.  
 9 Q. Okay. This is my brief on behalf of the  
 10 Crewses to the Court of Appeals. It's Exhibit 6 to this  
 11 deposition. You've never read this document at all,  
 12 correct?  
 13 A. No.  
 14 Q. Actually, that was y'all's brief. You've never  
 15 read your own brief either, correct?  
 16 A. Huh-uh.  
 17 Q. Okay. And this Memorandum Opinion that's now  
 18 Exhibit 8 to the deposition here is the opinion of the  
 19 Court of Appeals in this case. You've never read that,  
 20 correct?  
 21 A. It was read to me.  
 22 Q. Who read it to you?  
 23 A. My attorney, Ms. Nix.  
 24 Q. Okay. So that would have been sometime in  
 25 2020, correct?

Page 105

1 A. Yes.  
 2 Q. Do you understand -- I'm looking in the middle  
 3 of the page that I have up now -- that the Court of  
 4 Appeals has decided that the incident as a matter of  
 5 law, the incident between Hannah and Mr. Galvan, is a  
 6 matter of concern for the public? You understand that  
 7 now, correct?  
 8 A. I see where it reads that.  
 9 Q. Yeah. I'm going to submit to you that's the  
 10 opinion of the court. I'm not trying to be difficult  
 11 about that at all. Do you understand that the court has  
 12 found that to be the case, that that is now a matter of  
 13 public concern as a matter of law? Do you understand  
 14 that as we sit here today? I'm just asking for your  
 15 understanding, Ms. Galvan. Okay.  
 16 A. I don't agree with it, but, yeah, that's what  
 17 it's saying.  
 18 Q. That's what the Court of Appeals found in this  
 19 case, and that's binding upon this case. Do you  
 20 understand that?  
 21 MS. NIX: Objection; form.  
 22 THE WITNESS: It's findings. I don't know.  
 23 Q. (BY MR. CHAPMAN) Okay. Let me ask you this  
 24 question. Did you ever have an understanding that --  
 25 this opinion by the 13th Court of Appeals was issued in

Page 106

1 October of 2019, did you ever have an understanding in  
 2 2019 that you and your husband had the opportunity to  
 3 seek a review of this opinion and the decision in it by  
 4 the Texas Supreme Court?  
 5 MS. NIX: Objection; form.  
 6 THE WITNESS: No.  
 7 Q. (BY MR. CHAPMAN) You didn't know one way or  
 8 the other whether you could or couldn't appeal the  
 9 decision?  
 10 A. No. Yes. Yes.  
 11 Q. Okay. Do you have any understanding as we sit  
 12 here today why you and your husband did not seek a  
 13 review by the Texas Supreme Court?  
 14 A. No.  
 15 MR. CHAPMAN: I'm going to -- Angela, I'm  
 16 going to get out some discovery responses for her.  
 17 Let's take about a -- we've been going about 50 minutes.  
 18 Let's take about a five-minute break and let me get  
 19 those up so we can use those as an exhibit.  
 20 MS. NIX: Okay. Five minutes.  
 21 MR. CHAPMAN: Thank you.  
 22 (Recess from 1:34 to 1:42.)  
 23 Q. (BY MR. CHAPMAN) Ms. Galvan, I'm going to put  
 24 up some discovery responses, discovery questions and  
 25 responses that you made and ask you some questions about

Page 107

1 that. Those will be --  
 2 MR. CHAPMAN: Ms. Rimmer, we'll start with  
 3 16, and it will be 16 -- Exhibits 16 and 17 to the  
 4 depositions.  
 5 Q. (BY MR. CHAPMAN) All right. Are we back to  
 6 being able to see the documents?  
 7 A. Yes.  
 8 Q. Can you see documents back on the screen?  
 9 Okay. Ms. Galvan, I'm going to ask you to look at this  
 10 document entitled First Set of Written Interrogatories,  
 11 First Request for Admission and First Request for  
 12 Production to Plaintiff Sonia Galvan. Do you see that?  
 13 A. Yes.  
 14 Q. I'm going to submit to you that that was served  
 15 on your attorneys on January 23rd, 2020. Do you see  
 16 that, where I'm moving the cursor?  
 17 A. Yes.  
 18 Q. Do you recall when you first saw this document?  
 19 A. No.  
 20 Q. I'm going to flip over to what will be  
 21 Exhibit 17, which is your answers to interrogatories --  
 22 I'm going to scroll down quickly -- your answers to  
 23 admissions and your answers to production. Were you  
 24 able to see the titles of those documents?  
 25 A. Yes.

Page 108

1 Q. And those were answered on or about -- well, on  
 2 February 21st, 2020. Is that correct as far as you  
 3 know?  
 4 MS. NIX: Answered?  
 5 THE WITNESS: Answered or submitted?  
 6 Q. (BY MR. CHAPMAN) You provided -- you provided  
 7 discovery responses to my questions, to my written  
 8 discovery questions, on February 21st, 2020, correct?  
 9 MS. NIX: Objection; form. Counsel, you  
 10 said they were served February 23rd. How could the  
 11 responses have been deemed before they were served?  
 12 MR. CHAPMAN: No, you have the month wrong,  
 13 Counsel. It's January.  
 14 MS. NIX: Thank you.  
 15 Q. (BY MR. CHAPMAN) Do you remember getting  
 16 answers to Mr. Bence so he could serve them on me in  
 17 February 2020, Ms. Galvan?  
 18 A. No.  
 19 Q. Do you remember answering written discovery in  
 20 this case at all?  
 21 A. I'm not sure.  
 22 MS. NIX: Can you go back to the answers?  
 23 MR. CHAPMAN: Oh, sure.  
 24 MS. NIX: The scrolling back and forth  
 25 through the instructions, but if you'd leave it up on

Page 109

1 the answers for a minute when you're asking her if she  
 2 recalls that.  
 3 MR. CHAPMAN: Sure, sure. And it's a  
 4 little confusing because the way your lawyer did it was  
 5 to provide an answer without having a question written  
 6 above. So I'm not intentionally being confusing, but  
 7 the only way to see the question and then the answer is  
 8 to look at one document and then the other, Counsel. So  
 9 that's the --  
 10 MS. NIX: Objection. Prior lawyer.  
 11 MR. CHAPMAN: Prior lawyer. Sure.  
 12 Q. (BY MR. CHAPMAN) This is your response to  
 13 requests for -- to our interrogatories, and I'm going to  
 14 scroll down so you know that I'm on the same document.  
 15 Do you see where that was served on February 21st, 2020?  
 16 A. Yes.  
 17 Q. Do you recall participating in answering  
 18 interrogatories in this case sometime before February  
 19 2020?  
 20 A. Yes.  
 21 Q. Okay. Did you meet with Mr. Bence about it?  
 22 A. I believe so.  
 23 Q. At his office?  
 24 A. I think so.  
 25 Q. Okay. Do you know about when you began to

<p style="text-align: right;">Page 110</p> <p>1 answer these interrogatories?</p> <p>2 A. No.</p> <p>3 Q. Okay. I'm going to go back to the questions</p> <p>4 now so we can read some of the questions, then we can go</p> <p>5 over some of your answers. Okay?</p> <p>6 A. Uh-huh.</p> <p>7 Q. So I have to switch documents to do that. Just</p> <p>8 to show you that these are still to you, this is the</p> <p>9 written discovery to you and counsel has sent out</p> <p>10 January 23rd, to answer your prior question.</p> <p>11 A. Okay.</p> <p>12 Q. Now. I want to go back to interrogatory number</p> <p>13 ten which reads, Please identify all communications you</p> <p>14 made with any individual after learning that Richard</p> <p>15 Galvan had engaged in sexual relations with Hannah</p> <p>16 Crews, formerly known as Hannah Linn, which related to</p> <p>17 Richard and Hannah. And your answer to that question as</p> <p>18 served on me in February is, Debbie Sanchez, Bonnie</p> <p>19 De La Rosa and Monica Caban. Do you see that?</p> <p>20 A. I see that.</p> <p>21 Q. Now, my understanding of your prior testimony</p> <p>22 today was that you hadn't talked about this Richard and</p> <p>23 Hannah incident with anybody ever. Your interrogatory</p> <p>24 answer from back in February seems to indicate something</p> <p>25 different. Did you talk with Debbie Sanchez about</p>	<p style="text-align: right;">Page 112</p> <p>1 just have to ask her, correct?</p> <p>2 A. Yeah, I suppose.</p> <p>3 Q. Okay. Who is Bonnie De La Rosa?</p> <p>4 A. She's a friend of mine.</p> <p>5 Q. When did you talk with her about the Richard</p> <p>6 and Hannah incident?</p> <p>7 A. I believe that happened -- that incident</p> <p>8 happened this year.</p> <p>9 Q. Okay. Was it relating to the lawsuit then?</p> <p>10 A. It was actually -- I didn't really talk to them</p> <p>11 about it. They mentioned something to me about it.</p> <p>12 Q. Okay. What did they mention to you about it</p> <p>13 this year?</p> <p>14 MS. NIX: Objection; form.</p> <p>15 MR. CHAPMAN: What's the objection?</p> <p>16 MS. NIX: Hearsay.</p> <p>17 MR. CHAPMAN: That's not an objection for a</p> <p>18 deposition.</p> <p>19 Q. (BY MR. CHAPMAN) What did they mention to you</p> <p>20 about it?</p> <p>21 A. That they had seen something on Facebook about</p> <p>22 it.</p> <p>23 Q. Okay. What did they say they had seen?</p> <p>24 A. It wasn't Monica but it was Bonnie said that</p> <p>25 she had seen a post that someone was sharing on</p>
<p style="text-align: right;">Page 111</p> <p>1 Richard and Hannah?</p> <p>2 A. It was mentioned.</p> <p>3 Q. Who is Debbie Sanchez?</p> <p>4 A. She's a friend of mine.</p> <p>5 Q. When did you talk with her about the Richard</p> <p>6 and Hannah incident?</p> <p>7 A. Recently. I don't even remember.</p> <p>8 Q. Did you talk with her about it back in 2007?</p> <p>9 A. Oh, no.</p> <p>10 Q. Okay. So it would have been sometime in 2000--</p> <p>11 was it 2020 or was it 2018 or '19 or do you recall?</p> <p>12 A. I don't recall. It could have been anywhere</p> <p>13 between 2019 and 2020.</p> <p>14 Q. Okay. Do you remember what you told her about</p> <p>15 it?</p> <p>16 A. No specifics since it's -- I couldn't really</p> <p>17 talk about it.</p> <p>18 Q. Okay. Do you remember anything she said to you</p> <p>19 about it?</p> <p>20 A. She was just there for me for support.</p> <p>21 Q. Okay. But you don't recall her making any</p> <p>22 statements about what happened between Richard and</p> <p>23 Hannah one way or the other right now?</p> <p>24 A. No. No.</p> <p>25 Q. If we wanted to find out that information, we'd</p>	<p style="text-align: right;">Page 113</p> <p>1 something that Blaine and Hannah had posted.</p> <p>2 Q. Okay. Did you ever go back and try to find</p> <p>3 what that was?</p> <p>4 A. No, I didn't.</p> <p>5 Q. Okay. What did you tell Bonnie De La Rosa</p> <p>6 about in response, I guess?</p> <p>7 MS. NIX: Objection; form.</p> <p>8 THE WITNESS: I just told her I really</p> <p>9 couldn't talk about the details of it since the case is</p> <p>10 ongoing, and that was pretty much it.</p> <p>11 Q. (BY MR. CHAPMAN) Okay. How about Monica</p> <p>12 Caban? Who is she?</p> <p>13 A. She's a friend of mine.</p> <p>14 Q. Okay. When did you have occasion to talk with</p> <p>15 her about the Richard and Hannah incident?</p> <p>16 A. Well, she was at my house when Bonnie called</p> <p>17 me, so that's how that happened.</p> <p>18 Q. Okay. I gotcha. Was she listening to a phone</p> <p>19 call between you and Bonnie then?</p> <p>20 A. Well, we're all best friends, so --</p> <p>21 Q. Okay.</p> <p>22 A. Yeah, so she -- yeah.</p> <p>23 Q. Did that end up being a speakerphone call where</p> <p>24 everybody could hear?</p> <p>25 A. I don't know if it was speaker or I just turned</p>

Page 114

1 up the volume. I don't remember.  
 2 Q. Okay. Do you remember anything Monica said  
 3 during that conversation?  
 4 A. No. They didn't say much.  
 5 Q. Okay. Other than the time when there was this  
 6 call with Bonnie and Monica was at your house, have you  
 7 talked with Monica about this incident between Richard  
 8 and Hannah?  
 9 A. Yes.  
 10 Q. When else did you talk with her about it?  
 11 A. I mean, we -- not too much. She just calls to  
 12 check up on me.  
 13 Q. Was that all in the last year that you've  
 14 talked with her about it?  
 15 A. It's just this -- this year.  
 16 Q. This year?  
 17 A. This year, uh-huh.  
 18 Q. Okay. Do you recall anything she said to you  
 19 about the incident?  
 20 MS. NIX: Objection; hearsay.  
 21 THE WITNESS: No.  
 22 Q. (BY MR. CHAPMAN) Okay. Do Debbie, Bonnie and  
 23 Monica, to your knowledge, have any information about  
 24 the incident with Richard and Hannah other than what you  
 25 have talked about in your conversations with them?

Page 115

1 A. No.  
 2 Q. Okay. Going back to my questions, I'm on  
 3 request for admission number two. Do you see that on  
 4 the screen?  
 5 A. Uh-huh.  
 6 Q. Could you read that request for me?  
 7 A. Admit that Richard Galvan worked with Defendant  
 8 Hannah Crews in 2007.  
 9 Q. And what was your answer to that in February of  
 10 2020?  
 11 A. I don't know. I don't remember.  
 12 Q. Okay. Let me go down here and show you. This  
 13 is your response to Defendants' Requests for Admissions,  
 14 and I'm going to toggle back and forth so you can make  
 15 sure we're getting the same numbers. This is number  
 16 two, and your answer to number two is that you admit it,  
 17 correct?  
 18 A. I'm sorry. Say that again. Can you go back  
 19 real quick?  
 20 Q. Sure. We're looking at request for admission  
 21 number two, and I just want you to see that I believe  
 22 that you have admitted in February 2020 that Richard  
 23 employed Hannah Crews in 2007.  
 24 A. Right. I see that I did that.  
 25 Q. Okay. And you admitted that in response number

Page 116

1 two, correct?  
 2 A. Uh-huh. Yes.  
 3 Q. As we sit here today in May, do you believe  
 4 that response is wrong?  
 5 A. Yes.  
 6 Q. What is the basis for your belief that that  
 7 response is now incorrect?  
 8 A. We don't have any records. She did not work.  
 9 She did not work for us back then at all.  
 10 Q. So why did you admit that she worked for you in  
 11 February 2020, Ms. Galvan?  
 12 A. That was in error.  
 13 Q. Whose error was it?  
 14 A. Our attorney's.  
 15 Q. You're telling me that you told your attorneys  
 16 to deny that admission and then they changed it to  
 17 admit?  
 18 A. I'm not sure how it happened. It was just an  
 19 error. I don't know.  
 20 Q. Okay. Did you answer these admissions on paper  
 21 or electronically when you were going and doing your  
 22 answers for them?  
 23 A. I don't remember.  
 24 Q. Do you remember who brought you the questions  
 25 to answer? Was it Mr. Galvan or was it lawyers or who?

Page 117

1 A. I don't remember.  
 2 Q. But your testimony is today that you believe  
 3 somebody at your then attorney's office got your answer  
 4 wrong to number two?  
 5 A. Yes.  
 6 Q. Because you instructed them to deny that one;  
 7 is that correct?  
 8 A. That's correct.  
 9 Q. Is there anyone, Ms. Galvan, other than your  
 10 attorneys who would be able to back up what you say  
 11 about the error on response to number two?  
 12 A. I'm not sure.  
 13 Q. Are you willing to waive attorney/client  
 14 privilege so that I may ask your prior attorney if they  
 15 made a mistake on that one and put the wrong answer?  
 16 A. Yes.  
 17 MS. NIX: To that extent only, Mr. Chapman,  
 18 and specifically with regard to admission number two.  
 19 MR. CHAPMAN: I understand. That's all I'm  
 20 asking for.  
 21 Q. (BY MR. CHAPMAN) With respect to request for  
 22 admission number three, it reads, Admit that you  
 23 assisted with the youth group at North Way Bible Church  
 24 in Harlingen, Texas. Do you see that request for  
 25 admission?

Page 118

1 A. I do.  
 2 Q. And your answer -- I'm going to toggle back  
 3 over to number three -- is admit.  
 4 A. Right. We admit, yes.  
 5 Q. Do you admit that today that you assisted with  
 6 the youth group?  
 7 A. We assisted with coordinating for mission  
 8 trips, fundraisers, things of that nature.  
 9 Q. I'm just talking about you, Sonia Galvan, not  
 10 your husband. Do you admit that you assisted with the  
 11 youth group at North Way Bible Church?  
 12 A. Yes, in regards to the mission trips and just  
 13 very limited.  
 14 Q. Okay. Request to admissions number four.  
 15 Admit that you hired Hannah Crews, formerly known as  
 16 Hannah Linn, to baby-sit your children. Do you see that  
 17 number?  
 18 A. I do see that.  
 19 Q. Okay. And in your response in February is you  
 20 admitted that Hannah Crews baby-sat your children?  
 21 A. Unable to admit or deny that Hannah Crews was  
 22 hired.  
 23 Q. Do you admit -- you still agree with me today  
 24 that Hannah Crews baby-sat your children, correct?  
 25 A. Yes.

Page 119

1 Q. Yes? Okay. And as far as whether or not  
 2 hired, I understand your qualification there. You're  
 3 not a legal expert to know whether she was officially  
 4 hired or not. I get that. So that response still holds  
 5 today, correct?  
 6 A. Yes.  
 7 Q. Is there something about number nine that you  
 8 don't -- you didn't understand back in February,  
 9 Ms. Galvan?  
 10 A. Because it says sexual relations.  
 11 Q. Okay.  
 12 A. It was one time.  
 13 Q. So this goes back to the idea that if the S  
 14 wasn't on there and it said sexual relation, you would  
 15 admit to number nine, correct?  
 16 A. Yeah, just one -- one act, one time. Uh-huh.  
 17 Q. All right. I'm going to scroll on down.  
 18 Number 13 concerns Mr. Galvan and a prostitute. You  
 19 admitted to that. You don't have any reason to change  
 20 your answer today on that one, do you?  
 21 A. No.  
 22 Q. Do you know when you learned about that as we  
 23 sit here today?  
 24 A. I'm sorry. Can you go back to the question  
 25 real quick?

Page 120

1 Q. Sure.  
 2 A. Which one is that one? What number is that  
 3 one?  
 4 Q. 13.  
 5 A. Yeah, it was a long time ago. I don't remember  
 6 when I found out.  
 7 Q. Okay. If the records that I showed to  
 8 Mr. Galvan yesterday, which I'm not trying to hide from  
 9 you, if those are related to 1992, that would be before  
 10 you even met Mr. Galvan, correct?  
 11 MS. NIX: I'm sorry, Mr. Chapman. Which  
 12 admission are you asking about?  
 13 MR. CHAPMAN: 13.  
 14 MS. NIX: 13 is with regard to intentional  
 15 infliction of emotional distress?  
 16 MR. CHAPMAN: No, I'm on the admissions.  
 17 MS. NIX: Oh.  
 18 Q. (BY MR. CHAPMAN) Okay.  
 19 A. Oh, there we go.  
 20 Q. It's a simple question. You didn't meet  
 21 Mr. Galvan before 1992, did you?  
 22 A. No, no.  
 23 Q. Okay. That's all I'm asking for. Now, with  
 24 regard to requests for production, when you received  
 25 these in January or sometime before you answered them on

Page 121

1 February 21st, 2020, did you understand that these were  
 2 requests for documents?  
 3 A. Yes.  
 4 Q. Did you yourself make any effort to locate any  
 5 documents that were requested in our request for  
 6 production?  
 7 A. I don't have any documents, diaries, journals,  
 8 copies of the phone bills. No, I don't have any of  
 9 those.  
 10 Q. Okay. Did you make any -- did you spend any  
 11 amount of time attempting to locate any of the documents  
 12 described in the request for protection?  
 13 A. There are none.  
 14 Q. No, I know. I understand that's what you're  
 15 saying now. I'm asking you how much time you took to  
 16 determine that?  
 17 A. How long did it take me to determine that --  
 18 Q. That you had no documents in response to any  
 19 requests for production.  
 20 MS. NIX: Objection; form. The question  
 21 was how much time did you spend getting the documents?  
 22 MR. CHAPMAN: Objection. Objection;  
 23 side-bar. And, Counsel, there's no need to yell.  
 24 THE WITNESS: I already knew because there  
 25 were none. There was none.



Page 122

1 Q. (BY MR. CHAPMAN) Okay. It took -- you made  
 2 answers to these requests for production, and my  
 3 question to you is simply how much time did you  
 4 personally spend determining, as you say now, that you  
 5 have no documents responsive to any of these requests?  
 6 A. Zero.  
 7 Q. Okay. With respect to five, six and seven,  
 8 which regards medical or medical billing records  
 9 documenting treatment you are claiming is related to  
 10 this lawsuit, do you see that?  
 11 A. Uh-huh. Yes.  
 12 Q. Do you know why your response is that you will  
 13 make those documents available for review?  
 14 A. No.  
 15 Q. Okay. Is that an error?  
 16 A. I'm not really sure. No.  
 17 Q. Are there any medical or medical billing  
 18 records related to this case that you're aware of?  
 19 A. Not that I'm aware of, no.  
 20 Q. Let me pull up -- give me one second. I'm  
 21 looking for my numbered exhibits. Give me just one  
 22 second. I apologize, guys. I lost them in a directory  
 23 here. Here we go. Okay.  
 24 Ms. Galvan, have you ever seen what's  
 25 Exhibit 12 to the deposition, which is a newspaper

Page 123

1 article from the Valley Star, Valley Morning Star?  
 2 A. I saw it yesterday.  
 3 Q. Okay. Was yesterday the first time you'd ever  
 4 seen it?  
 5 A. Yeah. I don't recall. Uh-huh.  
 6 Q. Okay. Do you know how -- have any information  
 7 about how Daisy Martinez with the Morning Valley Star  
 8 determined that Mr. Galvan was a youth pastor for North  
 9 Way Bible Church?  
 10 A. I don't know.  
 11 Q. Do you recall your husband ever giving a quote  
 12 to the paper in a capacity of youth pastor?  
 13 A. No.  
 14 Q. If you look to the last paragraph of this  
 15 article that I've pulled up, at the bottom of the screen  
 16 it says, Sonia Galvan, also a youth pastor at the  
 17 church --  
 18 A. Uh-huh.  
 19 Q. -- said she hopes that her youth group can  
 20 teach people in Africa that they don't necessarily need  
 21 all the material things that other people may have and  
 22 that they only need to have faith. Do you remember  
 23 making that statement?  
 24 MS. NIX: Objection, Counsel. We can't see  
 25 the bottom of the screen. It's cut off.

Page 124

1 MR. CHAPMAN: Just tell me. That's fine.  
 2 I'm not trying to do that.  
 3 Q. (BY MR. CHAPMAN) Where is the last thing that  
 4 you can see on this screen?  
 5 A. To have, and then it fades, I guess. We can't  
 6 see that last sentence. But, no, I do not recall.  
 7 Q. Okay. I'll blow this up. The quality of this  
 8 one is not as good.  
 9 Do you recall ever seeing this article  
 10 regarding that same project quoting Mr. Galvan or  
 11 stating that he was the youth pastor?  
 12 A. I don't recall, no.  
 13 Q. Okay. Do you know if Mr. Galvan took any  
 14 action to have those articles removed from the  
 15 newspaper's websites?  
 16 A. No.  
 17 Q. Do you know anything about the recovery -- I  
 18 think he called it a recovery firm that was hired with  
 19 respect to internet search optimization and internet  
 20 search engine results?  
 21 A. No.  
 22 Q. Have you yourself undertaken any efforts to  
 23 remove internet search results or articles from the  
 24 internet about yourself and Mr. Galvan concerning the  
 25 North Way Bible Church or this case?

Page 125

1 A. No.  
 2 Q. Have you asked anybody else to do that on your  
 3 behalf?  
 4 A. No.  
 5 Q. Okay. One second. This is an email that I  
 6 showed your husband yesterday from a Pastor Kelly  
 7 Rumfield that he sent to my client on May 13th after  
 8 Mr. Galvan supplemented discovery responses.  
 9 A. Right.  
 10 Q. Do you know why Kelly Rumfield, pastor of the  
 11 North Way Bible Church, would state in an email that  
 12 Richard Galvan was the acknowledged youth minister --  
 13 youth leader and minister?  
 14 A. I'm not sure, but I know that he and Starla are  
 15 cousins.  
 16 Q. You're saying that that's incorrect?  
 17 A. That's correct.  
 18 Q. And despite the pastor from that church saying  
 19 that Richard Galvan led and was the minister for the  
 20 youth group back in 2007, your opinion is that that's  
 21 not correct?  
 22 A. That's correct.  
 23 Q. All right. These are the documents I showed  
 24 Mr. Galvan yesterday about the 1992 incident. Just read  
 25 that paragraph that starts with, I, Claude Ricks,

Page 126

1 please.

2 A. Okay.

3 Q. Before yesterday had you ever heard that

4 account of the 1992 incident?

5 MS. NIX: Objection; form. Answer.

6 THE WITNESS: Oh. I had heard about it.

7 He mentioned it maybe. But I had never seen any of

8 these documents.

9 Q. (BY MR. CHAPMAN) Okay. The thing says that

10 Mr. Galvan agreed to accept a fee and place his mouth on

11 the genitals of E. Leach, you didn't know any details

12 about that at all?

13 A. No.

14 Q. In Mr. Galvan's testimony yesterday I asked him

15 if the police informant, to his knowledge, was a man or

16 a woman. He said he did not know or do not recall. You

17 don't have any information about that one way or the

18 other, do you?

19 A. No, I don't.

20 Q. Do you know anything about -- I put up a

21 document now which I'll submit to you is a court clerk's

22 summary of a case that you and your husband filed

23 against Larry Peace and others. Do you know anything

24 about this lawsuit?

25 A. I do not recall.

Page 127

1 Q. Do you know what it was about at all?

2 A. I don't.

3 Q. Do you recall whether this lawsuit involved you

4 and your husband going and getting a temporary

5 restraining order?

6 A. I do not recall. I don't know.

7 Q. Do you recall executing any affidavits in

8 support of that lawsuit --

9 A. No.

10 Q. -- similar to what you executed in this case?

11 A. No.

12 Q. Okay. Do you recall any events wherein your

13 husband had asked Payton Linn to put on a wedding ring

14 so she could go into a bar underage. Do you know

15 anything about that?

16 A. No.

17 Q. Do you know about any incidents between your

18 husband and any other young women during the time y'all

19 have been married?

20 A. No.

21 Q. Ms. Galvan, I'm going to take a couple of

22 minutes. Let's take like five, five minutes. Actually,

23 it will probably be more like ten, Angela. Five to ten.

24 I'm going to go over my notes. I don't think I -- I

25 have very few, if -- excuse me. I have very few, if any

Page 128

1 more questions. I want to go through my notes and make

2 sure, and we'll come back here and finish this up.

3 Okay?

4 MS. NIX: For the record it's 2:14.

5 MR. CHAPMAN: All right.

6 (Recess from 2:15 to 2:26.)

7 Q. (BY MR. CHAPMAN) Ms. Galvan, I appreciate

8 your patience and attention to my questions today. We

9 talked a lot about this lawsuit today, and you were

10 present for a lot of the discussion about it yesterday.

11 Knowing what you know about the lawsuit now, as we sit

12 here today do you have any regret for filing this

13 lawsuit against my clients, Blaine and Hannah Crews?

14 A. I don't know if I have regret, but -- I don't

15 know. That's a difficult question.

16 Q. If when you look at the events of 2018 and to

17 2020, would you support filing the same lawsuit today

18 that you filed in 2018?

19 MS. NIX: Objection; form.

20 THE WITNESS: No.

21 Q. (BY MR. CHAPMAN) Why not?

22 MS. NIX: Objection; form.

23 THE WITNESS: Well, do I answer?

24 MS. NIX: Yeah.

25 THE WITNESS: Well, because of the phone

Page 129

1 call that Blaine had initially made and that was false.

2 It was not true what he was saying, you know, about

3 Hannah being seduced and manipulated and the threats

4 that he made towards, you know, my family.

5 Q. (BY MR. CHAPMAN) And if you still had any

6 avenue to seek an injunction against my clients today in

7 this court case, would you do it?

8 A. Yes.

9 MR. CHAPMAN: All right. I'll pass the

10 witness.

11 EXAMINATION

12 BY MS. NIX:

13 Q. Okay, Ms. Galvan. So we've covered some of

14 your history throughout Mr. Chapman's direct

15 examination, but I believe there were some things that

16 we may have left out. Do you have children?

17 A. Yes, I do.

18 Q. How many children do you have?

19 A. Three.

20 Q. And what are their names and ages, please?

21 A. Elliana, 15, Elijah, 14, and Esteban, eight.

22 Q. Okay. So during the depositions yesterday and

23 today when it's been explained that one child was taken

24 out of school and moved where the child's siblings were,

25 explain to me which of the children that was?

Page 130

1 A. Elijah.  
 2 Q. And he is the -- which one?  
 3 A. 14-year-old.  
 4 Q. Okay. The middle child?  
 5 A. Uh-huh.  
 6 Q. Okay. So your eldest and your youngest  
 7 children are both at the same school but your middle  
 8 child was not at that same school?  
 9 A. That's correct.  
 10 Q. Okay. And after the phone calls in or about  
 11 October of 2018 you had an occasion to move the middle  
 12 child's school to where his siblings were?  
 13 A. That's correct.  
 14 MR. CHAPMAN: Objection; form.  
 15 Q. (BY MS. NIX) And -- and with regard to  
 16 Mr. Chapman's questions earlier today, just a short time  
 17 ago when he inquired of you whether you could think of  
 18 anyone who could corroborate your assertion that Hannah  
 19 Crews was never employed by Orbit Broadband, have you  
 20 had an occasion to think of anybody who in fact might be  
 21 able to corroborate that since you initially answered  
 22 you didn't recall?  
 23 A. There are probably two people that would know,  
 24 and that would be Myra and Francisco.  
 25 Q. Okay. And let's go over that. So with regard

Page 131

1 to those names, do you recall a last name for Francisco?  
 2 A. I believe it's Barrientos.  
 3 Q. Okay. And what was Francisco Barrientos's  
 4 position with Orbit Broadband in or around 2007?  
 5 A. He was IT. He was our IT guy.  
 6 Q. Okay. And do you recall what period of time he  
 7 was employed by Orbit Broadband?  
 8 A. Maybe about a year or so.  
 9 Q. Okay. And with regard to the name Myra, do you  
 10 recall Myra's last name?  
 11 A. No, I don't.  
 12 Q. Okay. What was Myra's responsibilities or  
 13 capacities at Orbit Broadband?  
 14 A. She was like an office manager.  
 15 Q. Okay. And what period of time was she the  
 16 office manager, if you recall?  
 17 A. I don't recall the exact time. It could have  
 18 been a year or so, but I don't remember.  
 19 Q. Okay.  
 20 A. I don't recall.  
 21 Q. And -- and do you remember where Myra was from?  
 22 What town?  
 23 A. I don't remember. Mid Valley. Maybe Weslaco  
 24 or Donna. I don't remember exactly.  
 25 Q. Okay. And in 2007 did you ever have an

Page 132

1 occasion to go by the office and see Hannah and Richard  
 2 together in any type of suggestive manner?  
 3 A. No.  
 4 Q. Okay. Prior to August or September of 2007 did  
 5 you have any occasion to be concerned about Richard and  
 6 adultery?  
 7 A. No.  
 8 Q. At that time in August of 2007 were you  
 9 acquainted with who was Hannah Linn's boyfriend?  
 10 A. I knew she had a boyfriend, yeah.  
 11 Q. Okay. Did she come and confide in you  
 12 regarding that boyfriend or her relationship with that  
 13 boyfriend?  
 14 A. No.  
 15 Q. Okay. Do you recall that boyfriend's name?  
 16 A. I think his name might have been Jamie maybe.  
 17 No, I don't know.  
 18 Q. Okay. All right. And this was prior to any  
 19 alleged sexual incident with Richard Galvan, correct?  
 20 A. Yes.  
 21 Q. All right.  
 22 MR. CHAPMAN: Objection; form.  
 23 Q. (BY MS. NIX) Do you recall whether -- do you  
 24 recall at any point or anytime in August 2007 Hannah  
 25 Linn coming to Broadband Orbit -- Orbit Broadband

Page 133

1 distraught and traumatized over a breakup?  
 2 A. No.  
 3 Q. Did Hannah Linn confide in you regarding her  
 4 romantic involvements back in 2007?  
 5 A. No.  
 6 Q. To your knowledge, had Hannah Linn had  
 7 boyfriends prior to the alleged one she broke up with?  
 8 A. Yes.  
 9 Q. Are you acquainted with anyone other -- are you  
 10 acquainted with any of Hannah Linn's boyfriends from in  
 11 or around 2007 or subsequent years?  
 12 MR. CHAPMAN: Objection; form.  
 13 THE WITNESS: Not to my knowledge.  
 14 Q. (BY MS. NIX) Okay. Do you have any knowledge  
 15 regarding any of Hannah Linn's boyfriends' names in 2007  
 16 or after?  
 17 A. Not that I can recall.  
 18 Q. Okay. And I'm not specifying back in '07. I'm  
 19 saying now. Even now do you have any knowledge  
 20 regarding any of her boyfriends' names from that time  
 21 period?  
 22 MR. CHAPMAN: Objection; form.  
 23 THE WITNESS: I'm trying to remember. I  
 24 think she dated someone named Michael one time.  
 25 Q. (BY MS. NIX) Okay. And would that have been

Page 134

1 prior to the alleged event with Richard Galvan or after?  
 2 A. It was prior.  
 3 MR. CHAPMAN: Objection; form.  
 4 THE WITNESS: It was prior. Prior.  
 5 Q. (BY MS. NIX) Okay. And --  
 6 MR. CHAPMAN: Ms. Galvan, I know we're  
 7 trying to do this via videoconference, Counsel, but it's  
 8 very clear that Ms. Galvan appears to be looking down at  
 9 whatever it is that you're reading, and that is leading  
 10 without leading. So I'm going to object to any  
 11 attempted reading of your question or your notes for  
 12 direct examination while y'all are both sitting one foot  
 13 apart.  
 14 MS. NIX: How else do you want me to do it  
 15 since you want us both on the screen, Mr. Chapman? I  
 16 took notes during your direct and that's what I'm going  
 17 to use for my cross.  
 18 MR. CHAPMAN: This is actually direct for  
 19 you. I'm going to ask that you just distance yourself.  
 20 I don't need to see you for your direct of Ms. Galvan.  
 21 Just move away where she cannot see your notes.  
 22 MS. NIX: No problem. How about if I'm  
 23 back here?  
 24 MR. CHAPMAN: That's great.  
 25 MS. NIX: Is that okay?

Page 135

1 MR. CHAPMAN: That's great.  
 2 MS. NIX: That way I'm behind her.  
 3 Q. (BY MS. NIX) Ms. Galvan, sometimes when people  
 4 are redoing or making corrections to the documents they  
 5 do something called a red line or a blue line on the  
 6 document, and that's how you know there are changes  
 7 made. Are you aware of that?  
 8 A. Ask that again.  
 9 Q. Sometimes when people make changes to a  
 10 document, like they have one document and then they're  
 11 making changes to it in order to produce another  
 12 document, they red line the changes or blue line the  
 13 changes --  
 14 A. Oh, okay.  
 15 Q. Wait until I'm done, please.  
 16 A. I'm sorry.  
 17 Q. -- they red line the changes or they blue line  
 18 the changes so that then it pops and you can readily see  
 19 the difference between one document and another and what  
 20 was changed. You're aware of that?  
 21 A. Yes.  
 22 Q. Okay. Do you recall ever seeing anything like  
 23 that from your prior counsel of record between the  
 24 initial original petition, the initial pleading in this  
 25 matter, and the first amended original petition?

Page 136

1 A. No.  
 2 Q. Okay. And just to be very specific, do you  
 3 recall going to the office of Travis Bence regarding  
 4 this lawsuit?  
 5 A. Yes.  
 6 Q. How many times do you specifically recall going  
 7 to the office of Travis Bence with regard to this  
 8 lawsuit?  
 9 A. Maybe like two or three times.  
 10 Q. And other than recalling the number of times,  
 11 do you specifically recall what you covered on the  
 12 couple of times that you went to the office?  
 13 A. I do remember the initial conversation from  
 14 Blaine when I had to give my statement, I guess, of what  
 15 happened, and I don't remember the other two times.  
 16 Q. Okay. And with regard to the North Way -- I  
 17 think it's North Way Church of Harlingen. The church  
 18 that took the missionary trips from '07, what's the name  
 19 of that church?  
 20 A. North Way Bible Church.  
 21 Q. North Way Bible Church. With regard to the  
 22 North Way Bible Church, do you recall that the youth  
 23 group was specifically called the Generation Impact  
 24 Youth Group?  
 25 A. I believe so.

Page 137

1 Q. Okay. And do you recall any other members of  
 2 the Generation Impact Youth Group from '07 by name?  
 3 A. No.  
 4 Q. Yes or no?  
 5 A. Yes.  
 6 Q. Okay. Who else do you recall by name from the  
 7 youth group of the North Way Bible Church in '07?  
 8 A. There was Delaney.  
 9 Q. Is that a first name or a last name?  
 10 A. It's a first name. Delaney. I remember --  
 11 gosh, there were so many kids.  
 12 Q. Was Michael Garcia a member of the North Way  
 13 Bible Church youth group in 2007?  
 14 A. Yes. Yes, yes, he went.  
 15 Q. Was Michael Garcia a member of the youth group  
 16 for the church in '07 when Hannah Crews was a member?  
 17 A. Yes.  
 18 Q. Do you recall anyone else that might contradict  
 19 Pastor Kelly that you or Richard were youth pastors?  
 20 A. Yes.  
 21 Q. Who?  
 22 A. Michael.  
 23 Q. And who else besides Michael Garcia?  
 24 A. [No audible response.]  
 25 Q. Who is Oscar?

Page 138

1 A. He's a friend of ours.  
 2 Q. Give me a last name, please.  
 3 A. Oscar Brooks.  
 4 Q. Okay. How is Oscar Brooks or how was Oscar  
 5 Brooks related to the North Way Bible Church back in  
 6 '07?  
 7 A. He's a -- he just occasionally comes and he  
 8 preaches at the church. He's a missionary.  
 9 Q. He's a missionary?  
 10 A. He's a missionary.  
 11 Q. And he's a pastor?  
 12 A. I don't -- he might be.  
 13 Q. Okay.  
 14 A. I don't know if he is a pastor, but he is a  
 15 missionary at the church.  
 16 Q. And has he been ever since '07?  
 17 A. Yes, uh-huh.  
 18 Q. Okay. And it's your belief that he would  
 19 corroborate that neither you nor Richard were youth  
 20 ministers?  
 21 A. I think so.  
 22 Q. To your -- have you ever --  
 23 MR. CHAPMAN: Objection; form.  
 24 Q. (BY MS. NIX) Have you ever counseled any  
 25 youth?

Page 139

1 A. No, we have never counseled --  
 2 Q. This is directed only to you, please.  
 3 A. Oh, okay.  
 4 Q. So again, directed to you --  
 5 A. Okay.  
 6 Q. -- have you personally ever counseled any  
 7 youth?  
 8 A. No.  
 9 Q. To your knowledge, has Richard ever counseled  
 10 any youth?  
 11 A. No.  
 12 Q. To your knowledge, has Richard ever counseled  
 13 Hannah Linn?  
 14 A. No.  
 15 Q. Richard made it quite clear in his deposition  
 16 answers yesterday that he did not recall any fundraising  
 17 activities for Uganda. Do you recall any North Way  
 18 Bible -- North Way Bible Church's fundraising efforts  
 19 for Uganda?  
 20 A. I don't remember the Uganda.  
 21 Q. Okay. Who is Leslie Woodard?  
 22 A. She was a part of the youth group.  
 23 Q. Okay. So in one of those exhibits that  
 24 Mr. Chapman showed --  
 25 A. Uh-huh.

Page 140

1 Q. -- the one with the picture over to the left, I  
 2 believe the caption indicates it's Leslie Woodard.  
 3 Leslie Woodard would have been a member of the North Way  
 4 Bible Church's youth group in '07?  
 5 A. Yes.  
 6 Q. Okay. To your knowledge -- well, have you had  
 7 a chance to talk to any of the youth that were in the  
 8 North Way Bible Church's youth group in '07? Have you  
 9 had an occasion to talk to any of those youth since the  
 10 filing of this lawsuit in 2018?  
 11 A. No.  
 12 Q. Do you know whether Richard has?  
 13 A. No.  
 14 Q. Ms. Galvan, subsequent to the event complained  
 15 of -- and I'll specify for the record that that is the  
 16 one act of sexual intercourse between Richard Galvan and  
 17 Hannah Crews in or about August of 2007. Subsequent to  
 18 that I'd like to go through the history of yours and  
 19 your family's involvement with Ms. Hannah Crews, if you  
 20 don't mind. So subsequent to August of 2007 I believe  
 21 there was some testimony elicited by Mr. Chapman with  
 22 regard to a missionary trip in '08?  
 23 A. Yes.  
 24 Q. Okay. And to your knowledge, that missionary  
 25 trip was to where?

Page 141

1 A. Nicaragua.  
 2 Q. Okay. That's South or Central America, right?  
 3 A. Something like that.  
 4 Q. Yeah. South America. And you did not go on  
 5 that trip, correct?  
 6 A. No, I did not go.  
 7 Q. But Richard Galvan went and Hannah Crews went  
 8 among with other youth and adults, correct?  
 9 A. That's correct.  
 10 Q. Did Hannah Linn's parents go on that trip, to  
 11 your knowledge?  
 12 A. Not that I recall.  
 13 Q. Did her sister Payton go on that trip, to your  
 14 knowledge?  
 15 A. I believe she did.  
 16 Q. Okay. And was there any allegation about  
 17 inappropriateness or improper conduct on Richard's part  
 18 or with Hannah Galvan -- Hannah Crews -- Hannah Linn?  
 19 A. No.  
 20 Q. Any allegation about inappropriate conduct  
 21 between Richard Galvan and Payton Linn?  
 22 A. No.  
 23 Q. Okay. And then -- and then subsequent to that  
 24 and subsequent to August of '07 did Hannah Linn continue  
 25 being -- continue visiting the offices of Orbit

Page 142

1 Broadband?  
 2 A. Ask that again?  
 3 Q. Subsequent to August of '07 did Hannah Linn  
 4 continue visiting from time to time the offices of Orbit  
 5 Broadband?  
 6 A. Yes.  
 7 MR. CHAPMAN: Objection; form.  
 8 Q. (BY MS. NIX) Okay. And during any of those  
 9 times did you witness Ms. Linn evidencing any discomfort  
 10 or embarrassment or intimidation?  
 11 A. Not that I'm aware of.  
 12 Q. Or fear?  
 13 A. Not that I'm aware of, no.  
 14 Q. Okay. And after or -- can you think of  
 15 anything between August of '07 and the Nicaragua  
 16 missionary group that would have been summer of '08,  
 17 were there any other social contacts with Hannah Linn?  
 18 A. From 2007 to 2008?  
 19 Q. Summer. Right. From August of '07 --  
 20 A. Uh-huh.  
 21 Q. -- when the alleged intercourse occurred --  
 22 A. Uh-huh.  
 23 Q. -- to summer of '08 when the Nicaragua trip  
 24 occurred, were there any intervening contacts?  
 25 A. We went to church everything.

Page 143

1 Q. And that was how often? Church.  
 2 A. Every Sunday.  
 3 Q. Okay. Weekly once a week?  
 4 A. Weekly once a week, uh-huh.  
 5 Q. Okay. Anything else?  
 6 A. Sometimes after church on Sundays, although I  
 7 don't know if it was -- you know, we would go eat with  
 8 the family, you know. After church groups of us would  
 9 go together to go eat lunch after church.  
 10 Q. Okay. Any fundraising activities in  
 11 anticipation of the Nicaragua summer trip?  
 12 A. Oh, I'm sure we did. We had barbecues to  
 13 fundraise for the Nicaragua trip, maybe a car wash to  
 14 fundraise for the Nicaragua trip.  
 15 Q. Okay. Any hint of any problem between Hannah  
 16 Linn and Richard Galvan?  
 17 A. No.  
 18 Q. Any hint of any trauma she was suffering due or  
 19 attributable to him?  
 20 A. No.  
 21 Q. After the Nicaragua trip what was your  
 22 continued contact or your family's continued contact  
 23 with Hannah Linn?  
 24 A. Afterwards we went to church. We continued to  
 25 do, I guess, just socializing with them. I know that

Page 144

1 when she got married I helped host a bridal shower for  
 2 her. I went to a lingerie shower. We went to the  
 3 wedding. I know that when she was in college she came  
 4 down and we shot a commercial together.  
 5 Q. Okay. Explain that to me. Approximately when  
 6 when she was in college did she come down to shoot a  
 7 commercial?  
 8 A. She might have been maybe like a sophomore in  
 9 college, maybe a junior. I'm not sure when. And we  
 10 asked if she would, you know, shoot a commercial with  
 11 us, and she did. She came over. We all drove to  
 12 Brownsville to the station. We shot a commercial  
 13 together, and then we all went and ate lunch afterwards,  
 14 and then that was it.  
 15 Q. And again, no hint of any fear on her part with  
 16 regard to Richard?  
 17 A. No, she was very comfortable around us, you  
 18 know, smiling, laughing, just -- just seemed like  
 19 herself. I don't know. She was fine. She was fine.  
 20 Didn't seem threatened. She didn't seem uncomfortable  
 21 or she was fearful or she was intimidated. She didn't  
 22 seem anything like that.  
 23 Q. And are you aware that Blaine Crews has caused  
 24 videos to be posted on YouTube regarding the allegations  
 25 in this lawsuit?

Page 145

1 A. Yes, I am aware.  
 2 Q. Have you yourself looked at that video?  
 3 A. I have not looked at that video.  
 4 Q. Are you aware if Blaine Crews has posted the  
 5 allegations asserted in this lawsuit on other internet  
 6 forums, websites, posts?  
 7 A. Yes.  
 8 Q. Have you personally reviewed those posts or  
 9 websites?  
 10 A. No, I haven't.  
 11 Q. Mr. Chapman repeatedly inquired of you,  
 12 Ms. Galvan, whether you were mortified and embarrassed  
 13 that Richard had sex with Hannah in 2007. Do you recall  
 14 that?  
 15 A. Yes.  
 16 MR. CHAPMAN: Objection; form.  
 17 Q. (BY MS. NIX) What are your feelings with  
 18 regard to that event?  
 19 A. Well, I mean, I know that Richard did not use  
 20 his position or any type of position that he had to  
 21 manipulate or to seduce Hannah. You know, he's  
 22 regretful, remorseful. He's made a very bad decision,  
 23 but he and I have, you know, worked on our marriage and,  
 24 you know, through counseling and, you know, we've healed  
 25 and, you know, it's --

Page 146

1 Q. With regard to Hannah Crews's allegation that  
 2 she had a subsequent conversation with you regarding the  
 3 incident --  
 4 A. Uh-huh.  
 5 Q. -- and claimed that you told her everything was  
 6 okay, what do you recall from that conversation, if  
 7 anything?  
 8 MR. CHAPMAN: Objection; form.  
 9 THE WITNESS: I recall Hannah calling me  
 10 and she mentioned that she didn't know why this was  
 11 happening. I told her that everything was going to be  
 12 okay, and there were no details. There was no  
 13 discussion about what happened. And --  
 14 Q. (BY MS. NIX) When exactly did this occur, to  
 15 the best of your knowledge, that she called you and had  
 16 this conversation?  
 17 A. I believe it might have been -- it was shortly  
 18 after the incident, so it could have been a week to two  
 19 weeks. I don't exactly recall.  
 20 Q. And you're specifying in or about August 2007?  
 21 A. That's correct.  
 22 Q. And when you're saying there were no details  
 23 relayed, how did you know she was referring to the  
 24 incident if there were no details relayed?  
 25 A. Oh. Well, can you say that again?

Page 147

1 Q. Okay. So it's your testimony that Hannah  
 2 Crews, then known as Hannah Linn --  
 3 A. Uh-huh.  
 4 Q. -- called you and said -- and I quote -- I  
 5 don't know why this is happening.  
 6 A. Uh-huh.  
 7 Q. And your response to that was -- and I quote --  
 8 It's okay, everything is okay.  
 9 A. Uh-huh.  
 10 Q. Is that correct?  
 11 A. Yes.  
 12 Q. All right. So in her statement, I don't know  
 13 why this is happening, without any specificity as to  
 14 what this is -- in quotation marks --  
 15 A. Uh-huh.  
 16 Q. -- how did you know she was referring to the  
 17 act of sexual intercourse between she and Richard  
 18 Galvan?  
 19 A. Because Richard had mentioned it to me.  
 20 Q. All right. And do you recall how Hannah Linn  
 21 obtained her job at the news station?  
 22 A. I believe Richard helped her get that job.  
 23 Q. When would that have been, in or about, and do  
 24 you recall what news station it was?  
 25 A. It was after she graduated from college, and I

Page 148

1 believe it was channel four.  
 2 Q. Okay. So even up to and after graduation  
 3 college she was friendly enough in order to get an  
 4 introduction from Richard to a career?  
 5 A. That's right.  
 6 Q. I believe you said that you attended some  
 7 pre-wedding shower activities?  
 8 A. Yes.  
 9 Q. Okay. Did you have any occasion to be informed  
 10 or to learn through those pre-wedding shower activities  
 11 that Blaine Crews was a virgin prior to their marriage?  
 12 A. I believe at the lingerie shower Hannah had  
 13 mentioned something in regards to that.  
 14 Q. Okay.  
 15 MR. CHAPMAN: Objection; form. Objection  
 16 to the response as well.  
 17 Q. (BY MS. NIX) Okay. Did you actually hear this  
 18 or was it relayed to you?  
 19 A. I was there, so I heard her say that.  
 20 Q. Okay. And at that time was there any  
 21 conversation about her not being a virgin?  
 22 A. No.  
 23 Q. Okay. Do you have any reason to know when she  
 24 first told Blaine Crews that she was not a virgin?  
 25 A. No.

Page 149

1 Q. Okay. Do you have any -- do you know anything  
 2 about their breakup or when Blaine Crews and Hannah  
 3 Crews separated?  
 4 MR. CHAPMAN: Objection; form.  
 5 THE WITNESS: Just through -- I don't have  
 6 any details, but something that she posted on a blog or  
 7 something.  
 8 Q. (BY MS. NIX) Okay. Does Hannah Crews, also  
 9 sometimes known and formerly known as Hannah Linn, have  
 10 an occasion to be writing on any blogs?  
 11 A. Yes.  
 12 Q. For the record, what are her blog or blogs  
 13 called?  
 14 A. I believe one might be something like Healthier  
 15 Hannah maybe.  
 16 Q. Okay.  
 17 A. And then she may have another one like  
 18 Healthier or Happier, something like that, Hannah.  
 19 Q. Okay. And do you have any knowledge  
 20 regarding -- I'm sorry. Do you have any knowledge  
 21 regarding any of Hannah Crews's boyfriends committing  
 22 suicide?  
 23 A. Yes.  
 24 Q. Who committed suicide?  
 25 A. A young man named J.J.

Page 150

1 Q. And who was J.J. other than her boyfriend, if  
 2 you know?  
 3 MR. CHAPMAN: Objection; form.  
 4 THE WITNESS: I didn't know him personally  
 5 but I know he was a young man that her family took in  
 6 and lived with them at the house.  
 7 Q. (BY MS. NIX) Okay. So this is -- this is  
 8 someone that was not related to her family that wound up  
 9 living in her family's home?  
 10 A. Yes.  
 11 Q. At the same time she lived in her family's  
 12 home?  
 13 A. Yes.  
 14 Q. And this is a young man that was at or near her  
 15 in age?  
 16 A. Yeah, I believe so.  
 17 Q. Okay. And were they romantically involved?  
 18 A. Yes.  
 19 Q. Okay. And this individual committed suicide?  
 20 A. Yes.  
 21 Q. Do you know if Hannah Linn was intimate with  
 22 this individual before his suicide?  
 23 A. I believe so.  
 24 Q. Do you know when this individual committed  
 25 suicide?

Page 151

1 A. I don't know if it was -- I know she was in  
 2 college. Maybe sometime around 2010 or so.  
 3 Q. Have you read Hannah's blogs?  
 4 A. No, not -- not -- a long, long time ago, but  
 5 not recently.  
 6 Q. Are you aware that Hannah Crews has referred to  
 7 herself as a wild teenager?  
 8 A. Yes.  
 9 Q. What, if you know, would constitute her being a  
 10 wild teenager?  
 11 MR. CHAPMAN: Objection; form.  
 12 THE WITNESS: Her being -- you know,  
 13 drinking, promiscuous, you know, flirting.  
 14 Q. (BY MS. NIX) She consumed alcoholic beverages  
 15 as a minor?  
 16 A. That I'm not --  
 17 MR. CHAPMAN: Objection; form.  
 18 Q. (BY MS. NIX) Okay. When you said drinking,  
 19 what were you referencing?  
 20 A. Like maybe during her college years.  
 21 Q. Okay. Do you understand my question was  
 22 specifically asking about when she was 17?  
 23 A. Oh, 17. Oh, okay. No, not that I'm aware of.  
 24 Q. Okay. Ms. Galvan, are you aware what amount of  
 25 money Blaine Crews and Hannah Crews are seeking in this

Page 152

1 matter with regard to attorneys' fees?  
 2 A. No, I'm not.  
 3 Q. Are you aware what amount of money Blaine Crews  
 4 and Hannah Crews are seeking from you with regard to  
 5 costs or expenses suffered?  
 6 A. No.  
 7 Q. Are you aware of what amount of money Blaine or  
 8 Hannah Crews are seeking from you for sanctions?  
 9 A. No.  
 10 Q. Ms. Galvan, do you agree that your husband used  
 11 his position with the church in order to coerce or  
 12 manipulate Hannah Crews into having sex in August of  
 13 '07?  
 14 MR. CHAPMAN: Objection; form.  
 15 THE WITNESS: Absolutely not. He didn't  
 16 have a position, a title.  
 17 Q. (BY MS. NIX) And did he ever manipulate or  
 18 coerce her into having sex?  
 19 A. No.  
 20 MR. CHAPMAN: Objection; form.  
 21 Q. (BY MS. NIX) Do you agree with Ms. Crews's  
 22 assertion that she's been traumatized by that event ever  
 23 since '07?  
 24 MR. CHAPMAN: Objection; form.  
 25 THE WITNESS: It didn't seem as though she

Page 153

1 was traumatized.  
 2 Q. (BY MS. NIX) Prior to October of 2018 had it  
 3 ever been put to you that Hannah Crews was traumatized  
 4 due to this August 2007 event?  
 5 A. No.  
 6 MR. CHAPMAN: Objection; form.  
 7 Q. (BY MS. NIX) Have you had an occasion since  
 8 this litigation began to communicate with Starla Linn  
 9 regarding the allegations in this lawsuit?  
 10 A. Ask that again?  
 11 Q. Have you had an occasion since this litigation  
 12 began to communicate with Starla Linn regarding the  
 13 allegations in this lawsuit?  
 14 A. Yes.  
 15 Q. Did you reach out to her or did she reach out  
 16 to you?  
 17 A. I reached out to her.  
 18 Q. When was that?  
 19 A. Maybe about three weeks ago or four weeks ago.  
 20 I don't remember the exact date.  
 21 Q. How exactly did you reach out to Starla Linn?  
 22 A. I texted her.  
 23 Q. Okay. So you -- so you have the phone number  
 24 of Starla Linn or was this by -- yeah, phone number, I  
 25 guess, right?



Page 154

1 A. Yeah, I acquired her phone number.  
 2 Q. You just recently acquired it or you have had  
 3 it?  
 4 A. I recently acquired it.  
 5 Q. How do you acquire her phone number?  
 6 A. Through a friend.  
 7 Q. Okay. And so you texted her. What did you  
 8 text her?  
 9 A. Something along the lines like, Starla, hi,  
 10 this is Sonia, wanted to know if maybe we could meet and  
 11 talk. I think that's what I said at first.  
 12 Q. Okay. Anything else that you recall that you  
 13 said before she replied?  
 14 A. No, I think that might have -- that might have  
 15 been it.  
 16 Q. Okay. Did she reply?  
 17 A. She did.  
 18 Q. What did she reply?  
 19 A. She said something along the lines like, Oh,  
 20 Sonia, the Sonia I remember from many, many years ago.  
 21 Yes. When and where? She said, Yes, when and where?  
 22 And then she said, Well, I need to -- I would be afraid  
 23 to say something or do something that was wrong. I need  
 24 to pray about it. I want to take it to God and talk to  
 25 Hannah and Blaine.

Page 155

1 Q. Talk to him and Blaine?  
 2 A. Hannah and Blaine.  
 3 Q. Hannah and Blaine. Okay. And subsequent to  
 4 that did you have any further communication with Starla?  
 5 A. That was -- oh, I think I had also -- can I go  
 6 back and add something?  
 7 Q. Certainly.  
 8 A. Okay. So I think that -- I'm not sure when in  
 9 the text. I don't know if it was after she responded.  
 10 I responded with, you know -- you know, being really  
 11 broken about this and wanting to -- there being a lot of  
 12 hate and anger and wanting to be able to have some type  
 13 of healing over this. So that's what I had responded as  
 14 well.  
 15 Q. Okay. All right. And then after that what  
 16 happened?  
 17 A. Then about a few -- several hours later I  
 18 received a text.  
 19 Q. Okay. And what did that text say?  
 20 A. Pretty much all the allegations which Blaine  
 21 and Hannah or Hannah had said about, you know, Richard,  
 22 you know, them, you know, Hannah being under our care  
 23 and Richard manipulating and seducing her, and going on  
 24 to mention -- it was a very long text.  
 25 Q. Do you have any reason to doubt whether Starla

Page 156

1 actually offered that last text?  
 2 A. I'm not sure if she did.  
 3 MR. CHAPMAN: Objection; form.  
 4 Q. (BY MS. NIX) Why do you doubt that Starla was  
 5 the author of the last text?  
 6 MR. CHAPMAN: Objection; form.  
 7 THE WITNESS: I believe that when she  
 8 consulted with Hannah and Blaine that maybe Hannah might  
 9 have been the one who maybe helped write the change, you  
 10 know, because everything changed. When she first  
 11 responded to me in that text, Starla's, just the way she  
 12 responded was different than the text that came in  
 13 afterwards. So it just was different.  
 14 MS. NIX: Pass the witness.  
 15 FURTHER EXAMINATION  
 16 BY MR. CHAPMAN:  
 17 Q. All right. Ms. Galvan, we're going to have  
 18 some more questions. With respect to the direct  
 19 examination you were just asked questions by your own  
 20 lawyer at y'all's offices down in South Texas. Did you  
 21 read any of her notes or anything in writing while you  
 22 were answering those questions?  
 23 A. I was not reading her notes.  
 24 Q. Okay. With respect to the questions that she  
 25 asked you about things that may have occurred at the

Page 157

1 offices of Orbit Broadband, do you remember those  
 2 questions?  
 3 A. Yes.  
 4 Q. In 2007 how many days a week did you go to the  
 5 offices of Broadband -- excuse me -- offices of Orbit  
 6 Broadband on a given week?  
 7 A. Maybe like three or four days a week.  
 8 Q. How long did you stay?  
 9 A. I don't recall. A few hours maybe.  
 10 Q. Was that in the morning or the afternoons?  
 11 A. At different times, you know, depending on the  
 12 day, both, you know.  
 13 Q. Did you have a set schedule?  
 14 A. No, I didn't.  
 15 Q. Did you have a set office that was yours?  
 16 A. Yes.  
 17 Q. Did Richard have an office that was his?  
 18 A. Yes.  
 19 Q. Where was that in relation to the front door?  
 20 A. Towards the back.  
 21 Q. Was your office or where you worked, where you  
 22 went in to do your work at Orbit Broadband, was that  
 23 between the front door and Richard's office?  
 24 A. Yes.  
 25 Q. Did you ever have an occasion in 2007 to be

Page 158

1 there when Hannah Linn was there?  
 2 A. I don't recall.  
 3 Q. Was that a yes? Okay. You don't recall one  
 4 way or the other?  
 5 A. I don't recall.  
 6 Q. Did you ever have an occasion to see Hannah  
 7 Linn in Richard's office by herself with Richard?  
 8 A. No.  
 9 Q. Do you understand your husband has testified  
 10 that events occurred in his office when they were alone?  
 11 You were here yesterday for that.  
 12 A. Yes.  
 13 Q. You don't have any way to back up that one way  
 14 or the other, do you?  
 15 A. No.  
 16 Q. With respect to your husband's account of  
 17 events, your prior testimony before the direct was that  
 18 you had no other information about the events other than  
 19 what your husband had told you. Do you remember that  
 20 testimony?  
 21 A. Yes.  
 22 Q. What happened between when I asked you that  
 23 question and when counsel asked you questions a few  
 24 minutes ago that allowed you to identify people that  
 25 were at the office that you think would verify things

Page 159

1 relating to Hannah and Richard? What information did  
 2 you review?  
 3 A. I don't have any information here. I was just  
 4 trying to -- I just remembered.  
 5 Q. Okay. So you sat through a full day of  
 6 Richard's depo and up to that point in time in your depo  
 7 when you did not remember, but after a break you came  
 8 back and remembered people that you think would verify  
 9 something different than what you testified to before I  
 10 was done with you the first time on cross-examination;  
 11 is that correct?  
 12 A. Yes.  
 13 Q. And your testimony is you just remembered?  
 14 A. Yeah, I just remembered.  
 15 Q. Do you have any contact information for  
 16 Francisco Barrientos?  
 17 A. Say that again?  
 18 Q. Do you have any contact information for  
 19 Francisco Barrientos? Ma'am?  
 20 A. Me?  
 21 Q. Yeah. Do you have any contact information for?  
 22 A. Oh, no. I said no. I'm sorry. I thought you  
 23 heard me.  
 24 Q. I'm sorry. I didn't hear you.  
 25 A. Oh, yeah. No, no, no.

Page 160

1 Q. Do you know any way that information could be  
 2 found?  
 3 A. No, because I don't have any -- I don't have --  
 4 we don't have any records.  
 5 Q. You don't have any way to know what Francisco  
 6 Barrientos knows one way or the other?  
 7 A. No, I don't.  
 8 Q. Do you have any contact information for Myra,  
 9 your former office manager?  
 10 A. No, I don't.  
 11 Q. Do you have any business records that would  
 12 show her last name?  
 13 A. I don't.  
 14 Q. You don't have any way to get ahold of her or  
 15 even to find out a way to get ahold of her, do you?  
 16 A. I don't because I don't remember her last name.  
 17 Q. And your business has kept no records, correct?  
 18 A. That's correct.  
 19 Q. There's no way to know what she would know  
 20 about this, the events related to this lawsuit one way  
 21 or the other then, is there?  
 22 A. No.  
 23 Q. With respect to Ms. Hannah Crews, I asked you  
 24 if you had had any conversations with her about the  
 25 events with Richard, and your answer to me was no. Do

Page 161

1 you remember that testimony?  
 2 A. Yes, I think.  
 3 Q. You changed your testimony upon direct  
 4 examination by counsel. Why did you change it?  
 5 MS. NIX: Objection; form.  
 6 Q. (BY MR. CHAPMAN) Why did you change your  
 7 testimony?  
 8 A. I had forgotten about that conversation.  
 9 Q. You sat through a full day of deposition by  
 10 Richard Galvan and you sat through up to that point in  
 11 your deposition and you had not remembered a  
 12 conversation with Hannah Crews, the defendant in this  
 13 case, and then after I passed you as a witness you had  
 14 an occasion to finally remember that upon questions from  
 15 counsel; is that correct?  
 16 A. It was a very short conversation from what I  
 17 can recall. I just -- I forgot.  
 18 Q. And that occurred one to two weeks after the  
 19 incident between Richard and Hannah?  
 20 A. Yeah, it could have been. It's so long ago I  
 21 don't remember. Shortly after.  
 22 Q. Shortly after the incident between Richard and  
 23 Hannah?  
 24 A. Yes.  
 25 Q. And you say Hannah said something along the

Page 162

1 lines that you don't know why this is -- she doesn't  
 2 know why this is happening?  
 3 A. Right.  
 4 Q. What did you say in response?  
 5 A. What I -- I think what I had said, you know. I  
 6 think I said that it's going to be okay, it's going to  
 7 be okay. It was very -- I mean, I don't even -- it was  
 8 very quick. Like I had actually forgotten about it.  
 9 Q. Until just today?  
 10 A. Yeah.  
 11 Q. Okay. Your testimony to your counsel's  
 12 question was that she knew -- you knew this was about  
 13 Hannah's sexual incident with Richard because Richard  
 14 had admitted it. That was your answer to counsel a few  
 15 minutes ago, correct?  
 16 A. Yes.  
 17 Q. Do you understand that directly contradicts  
 18 your sworn discovery answers in this case?  
 19 A. No.  
 20 Q. Okay. Let me go back here. Request for  
 21 admissions number six. That request for admission  
 22 reads, Admit that you were aware of the fact that  
 23 Richard Galvan had sex with Hannah Crews, formerly known  
 24 as Hannah Linn, prior to the filing of this lawsuit. Do  
 25 you see that admissions?

Page 163

1 A. Okay. I see that.  
 2 Q. Your response to that admission that has not  
 3 been modified in this lawsuit says, Admit, I learned in  
 4 2018. Your prior testimony to me was that you first  
 5 learned of the -- that Richard had had sex with Hannah  
 6 2018 and that in 2007 you only knew that he had  
 7 committed some act of infidelity. Are you now changing  
 8 that testimony?  
 9 MS. NIX: Objection; form.  
 10 Q. (BY MR. CHAPMAN) Are you now changing that  
 11 testimony?  
 12 A. No, I always knew. He told me.  
 13 Q. He told you that he had had sex with Hannah in  
 14 2007?  
 15 A. Yes.  
 16 Q. Why did you say that you learned for the first  
 17 time in 2018 in your sworn discovery responses?  
 18 A. I don't know. That was an error.  
 19 Q. Whose error was that?  
 20 A. I don't know.  
 21 Q. You don't know?  
 22 A. No, I don't know.  
 23 Q. So your testimony now as of 3:19 p.m. in your  
 24 deposition is that you knew the identity of who Richard  
 25 had been unfaithful with back in 2007 and you knew that

Page 164

1 to be Hannah Crews. That's your testimony now?  
 2 A. Yes.  
 3 Q. Why didn't you talk to Hannah Crews about it?  
 4 A. Just we didn't talk about it. It was like her  
 5 mom didn't talk about it, just like her dad. We just  
 6 didn't talk about it.  
 7 Q. You weren't concerned about a mission trip in  
 8 2018 that you didn't go on and they both did?  
 9 A. No, not in 2008. No.  
 10 Q. 2008. Excuse me.  
 11 A. Uh-huh.  
 12 Q. Do you think there are any other conversations  
 13 with Hannah Crews that you're going to remember in the  
 14 next few minutes?  
 15 A. No.  
 16 Q. Do the identities of Hannah Crews's boyfriends  
 17 from high school or subsequent college boyfriends have  
 18 any relevance to this case at all?  
 19 A. I believe they do.  
 20 Q. In what way?  
 21 A. I believe that when she alleges that she was  
 22 traumatized, I don't believe that was, and I think she's  
 23 had other relationships. I know she had other  
 24 relationships prior to --  
 25 Q. You don't know -- you don't know that she had

Page 165

1 them prior to her incident with Richard. You don't know  
 2 that, do you?  
 3 A. Yes, I do.  
 4 Q. How do you know that?  
 5 A. I don't know. I do. I guess, common  
 6 knowledge.  
 7 Q. You don't have any facts that you can tell me  
 8 right now to back up your assertion that you know that,  
 9 do you?  
 10 MS. NIX: Objection; form.  
 11 THE WITNESS: No, not that I recall. No.  
 12 Q. (BY MR. CHAPMAN) So you don't know that,  
 13 correct?  
 14 A. That's correct.  
 15 Q. You're guessing, correct?  
 16 A. I'm not guessing. It's just my opinion, I  
 17 guess.  
 18 Q. An opinion that's not based on any fact that  
 19 you can tell me today, correct?  
 20 MS. NIX: Objection; form.  
 21 THE WITNESS: No.  
 22 Q. (BY MR. CHAPMAN) No facts, correct?  
 23 A. Yeah.  
 24 MS. NIX: Objection; form.  
 25 THE WITNESS: I don't know.

Page 166

1 Q. (BY MR. CHAPMAN) You understand that you and  
 2 your husband have no claims for any affirmative relief  
 3 left in this lawsuit. You understand that, correct?  
 4 A. Yes.  
 5 Q. You understand that Hannah Linn or -- excuse  
 6 me -- Hannah Crews's affidavit, formerly Hannah Linn,  
 7 has been on file with the court in this case since  
 8 February of 2019?  
 9 A. Yes.  
 10 Q. Correct?  
 11 A. Yes.  
 12 Q. And you understand that both you and your  
 13 husband have had a chance every single day since that  
 14 time to file an affidavit challenging the assertions  
 15 made by Hannah Crews in her affidavit. You understand  
 16 that, don't you?  
 17 A. Yes.  
 18 Q. Nothing prevented you from giving your account  
 19 of things or from Richard giving his account of things  
 20 that are different from Hannah Crews as this case went  
 21 through motion practice and then through the Court of  
 22 Appeals and then back, did it?  
 23 A. I don't know about that. I'm sorry. Can you  
 24 say that again?  
 25 Q. Yeah. Nothing prevented you from responding,

Page 167

1 filing a responsive affidavit, did it?  
 2 A. Just -- just not good attorney advice. Bad  
 3 attorney advice.  
 4 Q. You were asked by your counsel about red line  
 5 or blue line copies of documents in this case. Do you  
 6 remember that question?  
 7 A. Yes, I do.  
 8 Q. And she specifically asked about that between  
 9 the time of the filing of the original petition and the  
 10 first amended petition. Do you remember that?  
 11 A. Yes.  
 12 Q. Do you recall receiving any draft documents  
 13 from your counsel in that time period?  
 14 A. I'm not aware.  
 15 Q. Did you see any drafts? You don't know?  
 16 A. I don't recall.  
 17 Q. Your counsel asked you about going to Travis  
 18 Bence's office. Do you remember that?  
 19 A. I did.  
 20 Q. And she asked you on the record about the first  
 21 time you went to Travis Bence's office. Do you remember  
 22 that?  
 23 MS. NIX: Objection; form.  
 24 Q. (BY MR. CHAPMAN) Do you remember that  
 25 questioning?

Page 168

1 A. I remember the question.  
 2 Q. And your answer was about talking to Travis  
 3 about the things that were going to go into your  
 4 lawsuit. Do you remember that answer?  
 5 A. I'm sorry. Say that again? My answer was  
 6 what?  
 7 Q. You said -- you said something about talking to  
 8 Travis. She asked you what did you talk about with  
 9 Travis, and you said something about going to tell him  
 10 about the things in your statement. Do you remember  
 11 that?  
 12 MS. NIX: Objection; form. I never  
 13 inquired substance.  
 14 Q. (BY MR. CHAPMAN) Do you remember that  
 15 statement?  
 16 A. No.  
 17 MR. CHAPMAN: Madam Reporter, if you would  
 18 please find -- do a word search for Travis Bence and  
 19 find the question posed by Ms. Nix regarding  
 20 Ms. Galvan's visit to the office of Travis Bence,  
 21 please.  
 22 COURT REPORTER: I don't have that  
 23 capability right now.  
 24 MR. CHAPMAN: Okay. You can't find that  
 25 question?

Page 169

1 COURT REPORTER: It will take me some time.  
 2 Let me --  
 3 MR. CHAPMAN: Okay. Well, we'll proceed.  
 4 We'll proceed. Ms. Galvan, there's all likelihood in  
 5 the world that your attorney has waived attorney/client  
 6 privilege regarding your visit with Mr. Bence, and I  
 7 will visit with you about that later. If I so decide to  
 8 do so, we'll reserve that for later, reserve that  
 9 examination for later, and I will pass the witness.  
 10 MS. NIX: No further questions.  
 11 COURT REPORTER: Do you want this  
 12 transcribed?  
 13 MS. NIX: No, but I want to know what our  
 14 record time is before we go off record.  
 15 COURT REPORTER: Okay. Well, Mr. Chapman,  
 16 you want it transcribed and you want to order a copy?  
 17 MR. CHAPMAN: Yes, yes.  
 18 MS. NIX: I am requesting a copy of the  
 19 videotape, please.  
 20 COURT REPORTER: Zach, you got that?  
 21 VIDEOCONFERENCE HOST: Yes, ma'am. And,  
 22 Mr. Chapman, do you have a standing order with us for  
 23 video?  
 24 MR. CHAPMAN: I do now.  
 25 VIDEOCONFERENCE HOST: Did y'all want just



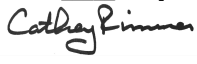
Page 174

1 I, SONIA GALVAN, have read the foregoing deposition  
 2 and hereby affix my signature that same is true and  
 3 correct, except as noted above.  
 4  
 5  
 6 \_\_\_\_\_  
 7 SONIA GALVAN  
 8 THE STATE OF )  
 9 COUNTY OF )  
 10 Before me, \_\_\_\_\_, on this day  
 11 personally appeared, SONIA GALVAN, known to me (or  
 12 proved to me on the oath of \_\_\_\_\_ or through  
 13 \_\_\_\_\_ (description of identity card or  
 14 other document)) to be the person whose name is  
 15 subscribed to the foregoing instrument, and acknowledged  
 16 to me that she executed the same for the purposes and  
 17 considerations therein expressed.  
 18 Given under my hand and seal of office this \_\_\_\_\_  
 19 day of \_\_\_\_\_, 2020.  
 20  
 21 \_\_\_\_\_  
 22 Notary Public in and for  
 23 the State of Texas.  
 24  
 25

Page 175

1 CAUSE NO. 2018-DCL-06387-I  
 2 RICHARD GALVAN and ) IN THE DISTRICT COURT  
 3 SONIA GALVAN, )  
 4 Plaintiffs, )  
 5 VS. ) 445th JUDICIAL DISTRICT  
 6 )  
 7 BLAINE CREWS and )  
 8 HANNAH CREWS, )  
 9 Defendants. ) CAMERON COUNTY, TEXAS  
 10  
 11 CERTIFICATE TO THE ORAL DEPOSITION OF  
 12 SONIA GALVAN  
 13 MAY 15, 2020  
 14 [REPORTED REMOTELY VIA VIDEOCONFERENCE]  
 15  
 16 I, Cathey Rimmer, Certified Shorthand Reporter in  
 17 and for the State of Texas, hereby certify to the  
 18 following:  
 19 That the witness, SONIA GALVAN, was duly sworn by  
 20 me and that the transcript of the oral deposition is a  
 21 true record of the testimony given by the witness;  
 22 That the deposition transcript will be submitted on  
 23 \_\_\_\_\_, to Ms. Angela Nix for examination and  
 24 signature by the witness, and is to be returned to me by  
 25 \_\_\_\_\_;  
 26 That the amount of time used by each party at the  
 27 deposition is as follows:  
 28 Mr. C. Davis Chapman - 3 hours, 32 minutes

Page 176

1 Ms. Angela Nix - 41 minutes  
 2 That pursuant to information given to the  
 3 deposition officer at the time said testimony was taken,  
 4 the following includes counsel for all parties of  
 5 record:  
 6 Ms. Angela Nix, Attorney for Plaintiffs;  
 7 Mr. C. Davis Chapman, Attorney for Defendants.  
 8 I further certify that I am neither counsel for,  
 9 related to, nor employed by any of the parties in the  
 10 action in which this proceeding was taken, and further  
 11 that I am not financially or otherwise interested in the  
 12 outcome of the action.  
 13 Further certification requirements pursuant to Rule  
 14 203 TRCP will be certified to after they have occurred.  
 15 Certified to by me this \_\_\_\_\_ day of \_\_\_\_\_,  
 16 2020.  
 17   
 18 \_\_\_\_\_  
 19 CATHEY RIMMER, Texas CSR 519  
 20 Expiration Date: 04/30/2021  
 21 Kim Tindall & Associates, LLC  
 22 16414 San Pedro, Suite 900  
 23 San Antonio, Texas 78232  
 24 Phone 866.672.7880  
 25 Firm Registration No. 631

Page 177

1 CERTIFICATION UNDER RULES 203 TRCP  
 2 The original deposition was/was not returned to the  
 3 deposition officer on \_\_\_\_\_.  
 4 If returned, the attached Changes and Signature  
 5 page contains any changes and the reasons therefor;  
 6 If returned, the original deposition will be  
 7 delivered to Mr. C. Davis Chapman in accordance with  
 8 Rule 203.3 TRCP.  
 9 That \$\_\_\_\_\_ are the deposition officer's  
 10 charges to the Defendants for preparing the original  
 11 deposition transcript and any copies of exhibits.  
 12 That a copy of this certificate will be served on  
 13 all parties shown herein and filed with the Clerk on  
 14 \_\_\_\_\_.  
 15 Certified to by me this \_\_\_\_\_ day of \_\_\_\_\_,  
 16 2020.  
 17  
 18 \_\_\_\_\_  
 19 CATHEY RIMMER, Texas CSR 519  
 20 Expiration Date: 04/30/2021  
 21 Kim Tindall & Associates, LLC  
 22 16414 San Pedro, Suite 900  
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 25 Firm Registration No. 631

<b>\$</b>	<b>156</b> 3:5	53:13,15,19 54:2,12,18 55:6,9,12,18,23 56:2,13 57:15,18 59:17,21 60:9,19 61:7,12 62:6 63:4,22 65:13,19 66:23 67:9,12,20 68:16,18,21 69:4,16,23 70:5 71:25 72:21,22 78:12,19,20 79:21 81:17 82:22 85:21 96:6,18 97:18 98:4,8,11 111:11 128:16,18 130:11 140:10 153:2 163:4,6,17 164:8
<b>\$1,000,000</b> 75:5	<b>15th</b> 172:14	
<b>\$1500</b> 37:3	<b>16</b> 107:3	
<b>\$335,000</b> 70:14	<b>16-page</b> 64:20	
<b>\$500,000</b> 70:15	<b>16414</b> 5:16	
<b>\$800,000</b> 53:25 54:3,13	<b>17</b> 69:17 107:3,21 151:22,23	
<b>\$835,000</b> 55:12 70:21 74:17,22 83:24 84:2	<b>185</b> 97:1	<b>2018-DCL-06387-I</b> 5:5
<b>0</b>	<b>19</b> 85:21 111:11	<b>2019</b> 65:23 66:10 80:13 83:23 85:3,14 88:8 92:7 106:1,2 111:13 166:8
<b>07</b> 18:7 50:11 102:6 133:18 136:18 137:2,7,16 138:6,16 140:4,8 141:24 142:3,15,19 152:13,23	<b>190</b> 96:25	<b>2020</b> 5:3 24:24 25:3 104:25 107:15 108:2,8,17 109:15,19 111:11,13 115:10,22 116:11 121:1 128:17
<b>08</b> 17:18 140:22 142:16,23	<b>190-pound</b> 99:4	<b>20th</b> 39:25
<b>09</b> 17:18	<b>1992</b> 120:9,21 125:24 126:4	<b>21st</b> 40:4 41:2 108:2,8 109:15 121:1
<b>1</b>	<b>2</b>	<b>222</b> 5:11
<b>1</b> 8:10 32:12	<b>2</b> 37:8	<b>23rd</b> 107:15 108:10 110:10
<b>1,000</b> 36:23	<b>2.b</b> 5:10	<b>25th</b> 42:20,21
<b>100</b> 94:18	<b>2000--</b> 18:7 102:6,17 111:10	<b>26</b> 43:4
<b>107</b> 3:9,11	<b>2002</b> 15:18	<b>27</b> 86:3,22
<b>10:02</b> 5:3	<b>2004</b> 101:21 102:4	<b>29</b> 44:14
<b>11:10</b> 42:21	<b>2006</b> 101:21	<b>2:14</b> 128:4
<b>11:25</b> 61:1	<b>2007</b> 18:8 25:8 40:9 41:6,11 46:6,7,8 65:2,8 83:14 88:25 93:17,18,23,25 95:2,3,8 96:8,11 97:21 98:6 99:23 100:7,10,12,14 101:1,14,18,19,21,23 102:10,12,16,17 103:6,10 111:8 115:8,23 125:20 131:4,25 132:4,8,24 133:4,11,15 137:13 140:17,20 142:18 145:13 146:20 153:4 157:4,25 163:6,14,25	<b>2:15</b> 128:6
<b>11:37</b> 61:1	<b>2008</b> 25:8 101:22 102:19 142:18 164:9,10	<b>2:26</b> 128:6
<b>12</b> 122:25	<b>2009</b> 17:18,20 25:9	<b>3</b>
<b>129</b> 3:4	<b>2010</b> 151:2	<b>3</b> 80:10,11
<b>12:00</b> 77:2	<b>2017</b> 46:5	<b>32</b> 171:1
<b>12:05</b> 78:8	<b>2018</b> 33:4 34:20 35:9,21 36:10,18,20 37:17,20 38:3 39:9,25 40:4 41:2 42:21 43:5 44:14,15 46:20 48:3 49:1,18,24 50:1,5,19 51:3 52:21	<b>3:19</b> 163:23
<b>12:35</b> 78:5,6		<b>3:27</b> 172:21
<b>12:43</b> 78:8		<b>4</b>
<b>13</b> 91:9,12,15,18,24 119:18 120:4,13,14		<b>4</b> 89:19,20
<b>13th</b> 64:21 66:10 92:19 105:25 125:7		<b>41</b> 171:2
<b>14</b> 129:21		<b>445th</b> 5:6 32:20
<b>14-year-old</b> 130:3		<b>5</b>
<b>15</b> 5:2 8:3,10 129:21		<b>50</b> 19:8,16 106:17

**502** 5:12**519** 5:13**59.03** 29:3**5:33** 44:15**5th** 33:4 37:17,20 38:3 39:9 54:12  
78:19 81:17

---

**6**

---

**6** 104:10**6:38** 40:5

---

**7**

---

**7:01** 41:2

---

**8**

---

**8** 3:3 104:18**8th** 80:13

---

**9**

---

**9/30/73** 15:1**900** 5:17**91** 15:13**97** 15:25 16:11**98** 17:12,13**9:16** 40:1

---

**A**

---

**a.m.** 5:3 42:21**ability** 84:21**Absolutely** 152:15**accept** 126:10**access** 30:3,15,22,25 31:1,20 91:5**accident** 26:2**accordance** 5:8**account** 99:8 100:21 126:4 158:16  
166:18,19**accounting** 19:22 20:19 21:2 31:2**accounts** 18:11,16 19:20**accused** 80:4**acknowledged** 125:12**acquainted** 132:9 133:9,10**acquire** 154:5**acquired** 154:1,2,4**act** 79:16 119:16 140:16 147:17  
163:7**action** 51:21 53:3,12,20 57:7,24  
61:7,11 124:14**actions** 54:4,13**active** 18:22 21:14 23:7 29:4 80:18**actively** 27:23 40:21 49:5**activities** 139:17 143:10 148:7,10**activity** 61:24**acts** 44:12**actual** 37:11 70:12**add** 8:5 155:6**added** 59:22 84:22**addition** 10:25 51:25 83:17**additional** 12:13 92:19 100:23**address** 5:16 7:17**administering** 5:13**administrator** 44:17**admission** 3:9 24:24 107:11 115:3,  
20 116:16 117:18,22,25 120:12  
162:21 163:2**admissions** 3:11 12:3,4 25:3  
107:23 115:13 116:20 118:14  
120:16 162:21,25**admit** 115:7,16 116:10,17 117:22  
118:3,4,5,10,15,21,23 119:15  
162:22 163:3**admitted** 24:16,23 115:22,25  
118:20 119:19 162:14**adultery** 132:6**adults** 25:14 103:2 141:8**advance** 96:14**advances** 95:20 97:12**advice** 67:14 167:2,3**advise** 171:11**advised** 42:13**affected** 41:24 42:6**affidavit** 75:18,22,24 76:23 77:5,9,  
24 79:8,13 84:6,11,14,23,25 85:2,  
14,21 86:10,13,17 87:4 88:1,8,13,  
18,21,24 89:10,20,25 90:6,10 91:23,  
24 92:7,9,11,13,21,22 93:1,4 95:13  
103:22 166:6,14,15 167:1**affidavits** 12:10 127:7**affirmative** 166:2**afraid** 154:22**Africa** 123:20**afternoons** 157:10**age** 100:18 150:15**ages** 129:20**agree** 14:12 43:13,15 44:4 49:4  
50:21 52:18 56:23 57:2 58:8 61:19  
74:16 95:14 105:16 118:23 152:10,  
21**agreed** 6:25 52:10,22 55:6 59:10  
60:11 95:13 126:10**agreement** 4:20**agreements** 4:22 8:3 14:5 27:6,18  
28:14**Agua** 102:8**ahead** 77:7 79:25**ahold** 160:14,15**alcoholic** 151:14**Aldana** 102:5**alert** 4:8**allegation** 64:4 141:16,20 146:1**allegations** 83:14 144:24 145:5  
153:9,13 155:20**allege** 44:3 48:19**alleged** 39:19,21 54:5 60:4 132:19  
133:7 134:1 142:21**allegedly** 49:14,18 60:8 82:22**alleges** 164:21**alleging** 44:5**allowed** 10:7 43:2 158:24



**alternative** 51:25  
**amended** 80:14,19 83:4,17,22 84:5,11,14,22 85:1,20,25 88:21 89:7,15 135:25 167:10  
**amending** 80:19 83:7  
**America** 141:2,4  
**amount** 70:13,17 121:11 151:24 152:3,7  
**and/or** 40:15  
**Angela** 6:1 106:15 127:23  
**Angelanixattorney@gmail** 7:19  
**anger** 155:12  
**annixattorney@gmail** 7:20  
**answering** 13:15 108:19 109:17 156:22  
**answers** 3:10,11 11:2,22 39:14 107:21,22,23 108:16,22 109:1 110:5 116:22 122:2 139:16 162:18 170:8  
**anticipation** 143:11  
**Antonio** 5:17 15:25 103:23  
**anytime** 132:24  
**apologies** 14:20  
**apologize** 7:16 77:1 122:22 172:4  
**appeal** 106:8  
**Appeals** 12:18 64:11,14,17,21,24 65:22 66:10 104:10,19 105:4,18,25 166:22  
**appearances** 5:19  
**appears** 134:8  
**application** 37:13 38:2 71:16 77:16 80:14 86:1  
**apply** 62:3  
**appointed** 24:12  
**Approximately** 144:5  
**area** 22:9  
**argued** 87:21  
**argument** 171:6  
**arrangements** 22:13  
**arrived** 54:9 55:2  
**article** 123:1,15 124:9

**articles** 124:14,23  
**assault** 50:2,3 51:22 52:2  
**asserted** 145:5  
**assertion** 130:18 152:22 165:8  
**assertions** 39:15 40:22 81:8,16,17 166:14  
**assets** 21:15  
**assisted** 117:23 118:5,7,10  
**Associates** 4:4 80:12  
**ate** 144:13  
**attached** 37:8  
**attempt** 54:20,24 93:1  
**attempted** 44:16 92:21 134:11  
**attempting** 35:21 121:11  
**attend** 25:14  
**attended** 24:6,9,13 148:6  
**attending** 6:7  
**attention** 128:8  
**attestation** 5:18  
**attorney** 28:21,24 29:2 76:1,3 104:23 117:14 167:2,3 169:5  
**attorney's** 116:14 117:3  
**attorney/client** 117:13 169:5  
**attorneys** 12:14 35:7 38:13,17,18 69:25 79:15 82:25 87:10 92:17 107:15 116:15 117:10  
**attorneys'** 70:5,24 152:1  
**attributable** 143:19  
**audible** 137:24  
**audio** 4:11,14 6:8,10 11:8 31:24 32:3  
**August** 103:6,10 132:4,8,24 140:17,20 141:24 142:3,15,19 146:20 152:12 153:4  
**author** 156:5  
**avenue** 129:6  
**award** 67:21 68:19  
**aware** 26:19,25 27:2,13 44:18 49:8,12,18,21 50:1 60:18 63:11,22 64:2,4 65:10,22 66:8,9 84:4 122:18,19

135:7,20 142:11,13 144:23 145:1,4 151:6,23,24 152:3,7 162:22 167:14

---

**B**


---

**baby-sat** 118:20,24  
**baby-sit** 118:16  
**back** 17:10 31:17 34:20 35:20 36:17,18,20 44:11 47:21 48:3 54:18 55:6,12 60:19 65:13 70:5 75:21 78:4,9,10 79:4,7,20 80:22 83:4 88:20 96:8,11 98:11,15,19 99:23 100:12,14,18 101:1 107:5,8 108:22,24 110:3,12,24 111:8 113:2 115:2,14,18 116:9 117:10 118:2 119:8,13,24 125:20 128:2 133:4,18 134:23 138:5 155:6 157:20 158:13 159:8 162:20 163:25 165:8 166:22  
**background** 15:2  
**bad** 35:11 63:8 145:22 167:2  
**bar** 127:14  
**barbecues** 143:12  
**Barrientos** 131:2 159:16,19 160:6  
**Barrientos's** 131:3  
**based** 30:9,13 94:23 165:18  
**basis** 61:10 64:14 66:4,5 67:12,16 87:15 104:6 116:6  
**BBA** 16:14,18  
**began** 109:25 153:8,12  
**begin** 6:4  
**beginning** 5:20 9:25  
**behalf** 38:21 104:9 125:3  
**belief** 116:6 138:18  
**believed** 54:21  
**believes** 92:21  
**Bence** 56:7 76:9,16 80:12 108:16 109:21 136:3,7 168:18,20 169:6  
**Bence's** 76:12 167:18,21  
**benefit** 4:18  
**beverages** 151:14  
**Bible** 24:7,18,22 25:8,12 101:18,23 117:23 118:11 123:9 124:25 125:11 136:20,21,22 137:7,13 138:5 139:18

140:4,8  
**big** 56:20  
**Bill** 47:6,10  
**billing** 20:3 122:8,17  
**bills** 121:8  
**binder** 27:4  
**binding** 105:19  
**birth** 14:25  
**bit** 9:22 15:2 47:22 90:12,13 93:19  
**Blaine** 5:6,24 6:6 32:21 33:10,20  
 36:23 40:2,5,7 41:3,5,7,9,11,12  
 42:4,6,10,22 43:7,17 44:4,12,16,18  
 45:2,9,11,21 46:11,18,20 48:3,15,  
 17,23 49:6 50:6,22 51:5 52:5 54:13  
 58:7,12,17 59:2,8,16 60:4,8 61:8,10  
 67:4 80:4 81:11,20 82:4,17 83:12  
 88:9,24 113:1 128:13 129:1 136:14  
 144:23 145:4 148:11,24 149:2  
 151:25 152:3,7 154:25 155:1,2,3,20  
 156:8  
**blanked** 6:8  
**blog** 6:18 149:6,12  
**blogs** 149:10,12 151:3  
**blow** 124:7  
**blue** 135:5,12,17 167:5  
**board** 23:9,21 24:3  
**boards** 23:12  
**bodily** 52:6,13,25  
**bond** 37:3  
**Bonnie** 110:18 112:3,24 113:5,16,  
 19 114:6,22  
**book** 73:11  
**bookkeeping** 19:2 20:14 31:5  
**books** 20:24 21:7,8 26:25 27:3,14,  
 17 28:3,5,7 29:6  
**bottom** 68:24 70:11,25 123:15,25  
**boyfriend** 132:9,10,12,13 150:1  
**boyfriend's** 132:15  
**boyfriends** 133:7,10 149:21  
 164:16,17  
**boyfriends'** 133:15,20

**break** 10:22 60:23 77:3 78:3,10,14  
 106:18 159:7  
**breaks** 4:12,18  
**breakup** 133:1 149:2  
**bridal** 144:1  
**Broadband** 19:11,13,17,19,22 20:5  
 27:12,14,21,24 29:1 130:19 131:4,7,  
 13 132:25 142:1,5 157:1,5,6,22  
**broke** 78:13 133:7  
**broken** 155:11  
**Brooks** 138:3,4,5  
**brought** 116:24  
**Brownsville** 6:2 144:12  
**buffered** 93:19  
**building** 29:21,22  
**bullet** 41:10  
**burden** 34:11  
**Buren** 5:11  
**business** 5:16 16:13 17:7 18:22  
 27:7 29:4,6,12,15,18,25 36:24  
 160:11,17  
**businesses** 17:23 18:3 26:23  
**bylaws** 27:5,18 28:8,13

---

## C

---

**Caban** 110:19 113:12  
**calculate** 54:20,25  
**call** 11:23 41:12 42:5,14 43:19  
 44:19,25 45:3,5,6,9 46:10,19 48:1,2,  
 15,17 49:6 50:24 52:10 58:12,16  
 59:2,7 76:8 113:19,23 114:6 129:1  
**called** 11:21 23:14 32:16 40:5 41:3  
 45:2 47:6 77:18 113:16 124:18  
 135:5 136:23 146:15 147:4 149:13  
**calling** 146:9  
**calls** 44:24 47:3 48:9,10,11 114:11  
 130:10  
**camera** 4:6  
**Cameron** 5:7 21:23 22:4 23:1 77:17  
**campaign** 43:6

**Cantu** 22:6  
**capability** 168:23  
**capacities** 131:13  
**capacity** 85:11 123:12  
**caption** 140:2  
**car** 26:2,3 143:13  
**care** 42:11 63:23 65:15 69:12 155:22  
**career** 148:4  
**carefully** 37:16  
**carve** 13:14  
**case** 7:6 10:15 11:2,10 12:8,11,15  
 25:23,25 32:20 52:24 64:15,18,22,  
 25 65:7 66:11 67:8 74:14 78:12 86:9  
 92:10 104:19 105:12,19 108:20  
 109:18 113:9 122:18 124:25 126:22  
 127:10 129:7 161:13 162:18 164:18  
 166:7,20 167:5  
**cases** 63:12  
**cash** 37:3  
**Cathey** 4:24 5:12  
**Catholic** 63:17  
**Catholics** 63:16  
**caused** 52:6 54:13 144:23  
**cell** 40:3,6  
**Central** 141:2  
**certificates** 27:5,18 28:8,13  
**certification** 22:9  
**certifications** 22:22  
**cetera** 30:17  
**chairs** 9:10  
**challenging** 166:14  
**Chamber** 23:24  
**chance** 72:3 140:7 166:13  
**change** 41:25 78:15 119:19 156:9  
 161:4,6  
**changed** 116:16 135:20 156:10  
 161:3  
**changing** 72:12 163:7,10  
**channel** 148:1

**Chapman** 3:3,5 5:21 6:3,5,12,14,17, 19,21,22,23 7:13,21,23,24 8:1,8,13, 17,23 9:6 13:8 14:15,16 32:2,5,15 56:5 60:22,24 61:2 65:5,10 66:4,7,9 73:24 74:21 75:1 76:24,25 77:2,4,7 78:2,5,7,9 79:25 80:9 81:24 82:14 87:15,17,20 90:23 91:1,3,6 93:10 97:7,9,10 99:15 105:23 106:7,15,21, 23 107:2,5 108:6,12,15,23 109:3,11, 12 112:15,17,19 113:11 114:22 117:17,19,21 120:11,13,16,18 121:22 122:1 124:1,3 126:9 128:5,7, 21 129:5,9 130:14 132:22 133:12,22 134:3,6,15,18,24 135:1 138:23 139:24 140:21 142:7 145:11,16 146:8 148:15 149:4 150:3 151:11,17 152:14,20,24 153:6 156:3,6,16 161:6 163:10 165:12,22 166:1 167:24 168:14,17,24 169:3,15,17, 22,24 170:7,20,21 171:1,5,13,15,19, 22,24 172:3,10,11,14,17,19

**Chapman's** 129:14 130:16

**Chapter** 86:2,3,22

**characterize** 25:12

**chat** 4:9

**check** 114:12

**Chief** 64:21

**child** 129:23 130:4,8

**child's** 129:24 130:12

**children** 23:11 41:13,23 42:5,11 50:23 52:12 80:6 118:16,20,24 129:16,18,25 130:7

**children's** 36:24 43:3,5 44:17

**church** 24:7,8,18,22 25:8,12 42:5, 12,13,23 43:1,2 47:1 48:12 62:23,25 63:6,17 101:5,18,23 117:23 118:11 123:9,17 124:25 125:11,18 136:17, 19,20,21,22 137:7,13,16 138:5,8,15 142:25 143:1,6,8,9,24 152:11

**Church's** 139:18 140:4,8

**churches** 24:5,9,13

**circumstances** 73:25

**citation** 32:17 37:9,10

**cited** 64:10 82:2,15

**civic** 22:24

**claim** 27:25 41:5 53:16,18 57:12 66:19,24 67:3

**claimed** 40:8 41:12 42:23 43:18 83:12 88:25 146:5

**claiming** 62:16 122:9

**claims** 33:10,15,17 34:8 52:1 70:14 166:2

**clarify** 7:8 10:21 12:23 35:13 43:17, 25 95:3

**Claude** 125:25

**Claudia** 85:8

**clear** 13:8 43:15 75:21 134:8 139:15

**clerk's** 126:21

**client** 45:9,11 48:22 58:17 59:16 60:8 65:7 81:11 125:7

**client's** 82:4

**clients** 9:8 24:24 32:21 33:11,16,17 34:9,18,22 35:22 36:11,22 61:8 67:10,22 75:10 128:13 129:6

**close** 96:21

**Cloud** 30:9,10

**club** 24:2,3

**coerce** 152:11,18

**coerced** 79:1

**college** 15:20 16:6 103:23 104:3 144:3,6,9 147:25 148:3 151:2,20 164:17

**comfortable** 144:17

**comment** 84:13,22

**Commerce** 23:25

**commercial** 144:4,7,10,12

**committed** 149:24 150:19,24 163:7

**committing** 149:21

**common** 165:5

**Commonwealth** 16:21

**communicate** 58:3 153:8,12 172:3

**communicated** 65:19 103:18

**communication** 155:4

**communications** 43:7 48:22 49:1, 19,22 56:10 58:7,11,18,21 69:8 76:16 82:17 103:12 110:13

**companies** 100:4,18

**company** 27:5,6,18 28:13

**company's** 26:7

**compelled** 6:8

**complained** 140:14

**completely** 91:4

**computer** 30:4,6,8,16,18,19,22 31:1,20 74:4

**concept** 68:8,15

**concern** 66:1,13 105:6,13

**concerned** 9:7 132:5 164:7

**concerns** 119:18

**concluded** 172:21

**conclusion** 7:11 81:4

**conduct** 63:24 65:25 141:17,20

**conducted** 5:8

**conducting** 10:6

**conference** 10:9,10

**confide** 132:11 133:3

**confirmation** 44:15

**confusing** 9:12 109:4,6

**congregation** 65:15

**congregations** 63:15

**Connect** 4:10

**connotes** 61:19

**consecutive** 8:5

**consent** 63:24 64:8 65:2,14

**consented** 65:8

**conservative** 9:23

**consistent** 68:14

**consolidated** 21:8

**constitute** 151:9

**constituted** 57:15,19

**consulted** 156:8

**consumed** 151:14

**contact** 44:16 48:2 103:5 143:22 159:15,18,21 160:8

**contacted** 42:12,22 43:5 49:9 60:15 108:9,13 109:8 110:9 121:23 123:24  
**contacts** 142:17,24 134:7 135:23 158:23 161:4,15  
 162:14 167:4,13,17  
**continue** 18:13 141:24,25 142:4  
**continued** 143:22,24  
**contradict** 137:18  
**contradicts** 162:17  
**contributing** 4:12  
**convenient** 77:3  
**conversation** 41:4 59:14 88:24  
 114:3 136:13 146:2,6,16 148:21  
 161:8,12,16  
**conversations** 13:4,7,16 47:1,17  
 94:4 114:25 160:24 164:12  
**converted** 21:12  
**coordinate** 25:13  
**coordinating** 118:7  
**copies** 38:12 121:8 167:5  
**copy** 4:20 32:18 37:10 74:5 77:15  
 80:13 85:19 169:16,18  
**corporate** 26:25 27:3,13,17 28:3,5,  
 7  
**correct** 6:17,19 9:15,16 14:18,22  
 15:16 16:2,16 17:25 18:9 19:1 20:21  
 21:24 23:16 24:18,21 26:15,16,18  
 29:7 30:24 32:1 33:7,17,20 35:15  
 36:2 44:5,8 45:3,19,24 47:3,4,17  
 48:9 50:24 56:25 57:4 59:11 60:17,  
 20,21 62:19 63:20,21 69:10 71:18,  
 25 73:6 78:24 79:2,3,17 83:7,8,19  
 84:11,17 86:5,20 87:23,24 88:14,18,  
 19 94:23,25 95:1,5,6 98:16,17  
 99:12,13,20 101:2,4 102:10 103:14,  
 19 104:12,15,20,25 105:7 108:2,8  
 112:1 115:17 116:1 117:7,8 118:24  
 119:5,15 120:10 125:17,21,22  
 130:9,13 132:19 141:5,8,9 146:21  
 147:10 159:11 160:17,18 161:15  
 162:15 165:13,14,15,19,22 166:3,10  
**corrections** 135:4  
**correctly** 71:18 95:3  
**corroborate** 130:18,21 138:19  
**costs** 152:5  
**couch** 98:9,13  
**counsel** 5:18,19,20,22,23 6:1 73:21  
 108:9,13 109:8 110:9 121:23 123:24  
 134:7 135:23 158:23 161:4,15  
 162:14 167:4,13,17  
**counsel's** 10:14 162:11  
**counseled** 138:24 139:1,6,9,12  
**counseling** 145:24  
**country** 24:2,3  
**County** 5:7 21:24 22:4 23:1 77:17  
**couple** 88:5 127:21 136:12  
**court** 4:25 5:2,7,12 7:5 8:12,15 10:7  
 11:3 12:18 32:20 33:24 35:8,15  
 64:11,14,17,19,21,24 65:6,22,23  
 66:10 67:9 68:19 70:17 77:17 87:12  
 90:24 92:10 104:10,19 105:3,10,11,  
 18,25 106:4,13 126:21 129:7 166:7,  
 21 168:22 169:1,11,15,20 170:22,25  
 171:12,16,23 172:2,5,8,13,16  
**courthouse** 10:13,16  
**cousin** 22:2  
**cousins** 125:15  
**cover** 80:12  
**covered** 129:13 136:11  
**COVID-19** 5:9  
**CPRC** 86:3,22  
**crafting** 84:10  
**create** 80:19  
**Crews** 5:6,24 6:6 7:3 32:21 33:11,20  
 36:5,13,23 37:10 40:2,5,7,9 41:3,5,  
 7,9,11,12 42:4,6,7,10,22,24 43:7,18  
 44:4,16,19 45:2,9,11 46:11,20 47:2  
 48:3,15,17,23 49:2,5,9,13,19,22  
 50:2,15,22 51:5 52:5,11 58:7,12  
 59:2,16 60:4,9,14 61:8,10 65:1,7,24  
 66:12 67:4 68:20 81:11,20 83:12,14  
 88:17,25 89:1,21,25 110:16 115:8,  
 23 118:15,20,21,24 128:13 130:19  
 137:16 140:17,19 141:7,18 144:23  
 145:4 147:2 148:11,24 149:2,3,8  
 151:6,25 152:3,4,8,12 153:3 160:23  
 161:12 162:23 164:1,3,13 166:15,20  
**Crews's** 44:12 46:18 50:6 54:13  
 58:17 82:5,17 88:10 90:9 92:1 146:1  
 149:21 152:21 164:16 166:6  
**Crewses** 6:13 38:21 53:7,12,25  
 69:1 70:1 104:10  
**Crewses'** 51:16 54:4  
**criminal** 26:21  
**cross** 134:17  
**cross-examination** 159:10  
**CSR** 5:13  
**current** 10:7 15:14  
**curse** 41:8  
**cursor** 107:16  
**curtail** 51:16  
**cut** 123:25  


---

**D**

---

**dad** 164:5  
**Daisy** 123:7  
**damage** 54:14 55:22  
**damaged** 69:21  
**damages** 53:25 54:4,21,25 60:3,7  
 67:22,24 68:2,4,6,7,12,13,15,20  
 70:13,15,22 74:17 83:25 84:2 89:16  
**date** 5:2 14:25 44:17 153:20  
**dated** 80:12 133:24  
**Davis** 5:21  
**day** 42:12,23 43:3 73:24 92:18  
 157:12 159:5 161:9 166:13 171:17  
 172:19  
**days** 92:19 157:4,7  
**De** 110:19 112:3 113:5  
**deal** 56:20  
**death** 25:22  
**Debbie** 110:18,25 111:3 114:22  
**decide** 169:7  
**decided** 105:4  
**decision** 106:3,9 145:22  
**deemed** 108:11  
**defamation** 57:7,12,16,20,24 59:23  
 61:6 70:15  
**defamatory** 49:18,21 50:7,8 58:13,  
 22 59:17 60:4,8,16

**defame** 58:2  
**defaming** 43:6 49:14 58:7 61:9  
**defendant** 6:6 40:1,2,5,9 41:3,5,7,9, 10,11,12 42:3,4,6,9,22,24 43:7 44:12,16 68:14 83:14 115:7 161:12  
**Defendants** 5:22,24 70:13  
**Defendants'** 86:2,22 89:21 115:13  
**degree** 16:1,12  
**Delaney** 137:8,10  
**deliver** 4:25  
**demanded** 40:3 42:7  
**deny** 116:16 117:6 118:21  
**depending** 157:11  
**depends** 31:11  
**depo** 7:12 9:25 32:12 36:2 159:6  
**deponents** 90:23  
**depositing** 37:2  
**deposition** 3:7 5:4,14 6:7 9:14 11:19 12:25 13:5,10,20,24 14:2 25:17,20,25 26:9,10 37:8 80:10 89:20 90:3 92:18 95:11 104:11,18 112:18 122:25 139:15 161:9,11 163:24 170:11  
**depositions** 6:10 107:4 129:22  
**describe** 25:11  
**DESCRIPTION** 3:7  
**detail** 35:5 78:20  
**details** 51:7,9 68:10 113:9 126:11 146:12,22,24 149:6  
**determine** 121:16,17  
**determined** 64:25 123:8  
**determining** 122:4  
**Development** 23:21  
**diaries** 121:7  
**difference** 135:19  
**difficult** 105:10 128:15  
**digits** 14:13  
**direct** 92:1 129:14 134:12,16,18,20 156:18 158:17 161:3  
**directed** 139:2,4

**directional** 9:9  
**directly** 4:10 45:12 76:16 162:17  
**director** 17:14,15 22:12  
**director's** 22:14,20  
**directory** 122:22  
**disagree** 6:23 41:21 77:13 99:16 171:15  
**disagreed** 39:22  
**disagreement** 40:11 41:15 44:21 99:11  
**disagreements** 42:17  
**Disaster** 5:10  
**disclosure** 66:20,25 67:5  
**discomfort** 142:9  
**discovery** 11:24 92:20 93:2,12 106:16,24 108:7,8,19 110:9 125:8 162:18 163:17  
**discussion** 103:21 128:10 146:13  
**dismiss** 86:2,9,11,22 87:2,22 89:22 92:8  
**dispute** 99:25  
**distance** 134:19  
**distraught** 133:1  
**distress** 53:4,7,11,17 56:16 120:15  
**District** 5:7 32:20  
**divorced** 26:15  
**document** 14:6 32:22 37:12,14,16, 20 72:9 80:15 104:11 107:10,18 109:8,14 126:21 135:6,10,12,19  
**documenting** 122:9  
**documents** 11:18 12:17 21:14 27:7,16 28:6,10,12,17 29:18,25 31:16,21 38:12 72:21 75:11 107:6,8, 24 110:7 121:2,5,7,11,18,21 122:5, 13 125:23 126:8 135:4 167:5,12  
**dollars** 60:7 75:10  
**Donna** 131:24  
**door** 157:19,23  
**doubt** 155:25 156:4  
**draft** 167:12

**drafting** 40:22  
**drafts** 167:15  
**dragon** 96:1  
**drill** 59:13  
**drinking** 151:13,18  
**drive** 8:10 15:14  
**driver** 26:3  
**driver's** 14:9,13  
**drops** 47:22  
**drove** 144:11  
**due** 21:12 143:18 153:4  
**Dulce** 102:8  
**duly** 8:21  
**duration** 13:10

---

**E**


---

**earlier** 70:20 76:2 86:7 130:16  
**East** 5:11 15:22 16:3,10  
**eat** 143:7,9  
**economic** 23:20 74:17  
**education** 15:21  
**effort** 121:4  
**efforts** 124:22 139:18  
**elaborate** 88:11  
**eldest** 130:6  
**electronic** 19:22  
**electronically** 116:21  
**eleven** 91:9  
**elicited** 140:21  
**Elijah** 129:21 130:1  
**Elliana** 129:21  
**email** 7:15 8:9,11 76:18,19,21 125:5, 11  
**emails** 38:8  
**embarrassed** 69:21 145:12  
**embarrassment** 142:10  
**emergency** 5:9 10:8

**emotional** 53:4,7,11,16 56:16 69:7 120:15  
**employed** 115:23 130:19 131:7  
**end** 4:14 10:10 17:19 41:13 46:11 113:23 172:14  
**endeavor** 32:9  
**ended** 26:3,4  
**engaged** 110:15  
**engine** 124:20  
**enjoin** 51:16  
**enrolled** 44:13  
**entailed** 35:2  
**Enterprises** 5:11  
**entice** 61:16  
**entire** 81:15  
**entirety** 4:18  
**entities** 28:8,16,25  
**entitled** 37:12 39:4 70:4 107:10  
**entity** 29:25  
**error** 89:12,13 116:12,13,19 117:11 122:15 163:18,19  
**Esteban** 129:21  
**event** 134:1 140:14 145:18 152:22 153:4  
**events** 95:8 101:6 127:12 128:16 158:10,17,18 160:20,25  
**evidence** 65:6 66:6  
**evidencing** 142:9  
**exact** 40:14 131:17 153:20  
**examination** 3:3,4,5 8:22 129:11, 15 134:12 156:15,19 161:4 169:9  
**Excellent** 32:8,15  
**excuse** 61:9 127:25 157:5 164:10 166:5 170:6  
**execute** 79:8  
**executed** 85:13 127:10  
**executing** 85:2 127:7  
**exemplary** 67:22,24 68:2,6,11  
**exhibit** 32:12 37:8 80:10,11 89:19, 20 104:10,18 106:19 107:21 122:25

**exhibits** 3:7 7:9 8:2,3,4,6 31:18 107:3 122:21 139:23  
**existed** 20:5  
**expect** 12:22  
**expenses** 152:5  
**expert** 119:3  
**explain** 129:25 144:5  
**explained** 41:9 51:10 59:25 129:23 170:16  
**extent** 117:17  
**extra** 170:7,8

---

**F**


---

**Facebook** 40:1 46:15 112:21  
**fact** 34:7 50:9 130:20 162:22 165:18  
**facts** 39:4,18,21,24 40:12 41:16 43:9 44:1,2,22 46:1 48:19 51:2 64:25 66:5,20,25 67:5 71:17 80:24 81:4,8,15 82:2,14,15 83:9 86:4 165:7,22  
**factual** 39:14 40:18,22 42:16 81:8, 16,17  
**factually** 67:16  
**fades** 124:5  
**fair** 11:16 31:22 35:3 65:19 69:8  
**faith** 42:8 123:22  
**fall** 93:25 101:16,18  
**false** 81:11,20,22 82:5,9,17,23 83:2, 15 88:10,15,17 89:1,4,6 129:1  
**family** 17:8,11 21:23 26:17 69:6 98:16 101:1,2 129:4 143:8 150:5,8  
**family's** 140:19 143:22 150:9,11  
**fashion** 7:4  
**father** 94:13  
**FCA** 23:7  
**fear** 44:11 142:12 144:15  
**fearful** 144:21  
**feature** 41:4  
**February** 24:24 25:3 80:13 83:23 85:3,14,21 88:8 92:7 108:2,8,10,17 109:15,18 110:18,24 115:9,22

116:11 118:19 119:8 121:1 166:8  
**fee** 126:10  
**feel** 6:8 10:19 80:7  
**feelings** 145:17  
**fees** 69:25 70:5,24 152:1  
**feet** 36:23 96:22 98:21  
**felt** 21:13 80:3  
**figures** 55:12,23  
**file** 78:21 79:20 80:3 82:22 84:25 87:10 92:9,13 166:7,14  
**file-marked** 77:15  
**filed** 5:6 12:11,14 14:6 25:2 33:2,4, 23 34:20 35:1 36:17 37:17 38:3,9, 10,13,14,18,20 39:8 44:25 49:13,17 51:3,11,19 53:5,13,15,16,18,24 54:12,22 55:1,18 56:2,13 57:18 59:18,22 60:9,20 61:7,13 62:19,21 63:12 65:13,18 66:23 67:20 69:24 76:3,13 77:17 78:18 81:16 82:1,24 83:18 86:8 89:15 92:7,19 93:11 126:22 128:18  
**files** 21:18 30:14 38:5  
**filing** 56:8 79:2 82:21 128:12,17 140:10 162:24 167:1,9  
**filings** 38:16  
**finally** 15:23 161:14  
**find** 42:9 111:25 113:2 160:15 168:18,19,24  
**findings** 105:22  
**fine** 7:22 124:1 144:19  
**finish** 128:2  
**finished** 15:24  
**firm** 124:18  
**five-minute** 60:23 106:18  
**flip** 107:20  
**flirting** 151:13  
**folks** 78:3  
**food** 9:18  
**foot** 134:12  
**forget** 16:11 102:9  
**forgive** 170:14

**forgot** 161:17**forgotten** 161:8 162:8**form** 13:6 28:25 56:3 65:3,9 66:2  
73:21 74:19,24 79:22 87:14 93:8  
99:14 105:21 106:5 108:9 112:14  
113:7 121:20 126:5 128:19,22  
130:14 132:22 133:12,22 134:3  
138:23 142:7 145:16 146:8 148:15  
149:4 150:3 151:11,17 152:14,20,24  
153:6 156:3,6 161:5 163:9 165:10,  
20,24 167:23 168:12**formation** 27:5,18 28:8,13**formed** 28:20**Fort** 5:24**forums** 145:6**forward** 7:18 36:8 39:1 47:23**forwarded** 7:14**found** 65:6,23 66:10 105:12,18  
120:6 160:2**fourth** 95:24 97:23 98:12 99:10**frame** 95:3**Francisco** 130:24 131:1,3 159:16,  
19 160:5**fray** 172:6**free** 10:19**freedom** 51:16**freezes** 11:9**freshman** 103:23 104:3**friend** 111:4 112:4 113:13 138:1  
154:6**friendly** 148:3**friends** 98:16 101:2 113:20**front** 10:12 37:9,11 39:4 157:19,23**frustrating** 69:7**full** 10:3 17:17 55:15 159:5 161:9**fundraise** 143:13,14**fundraisers** 25:13 118:8**fundraising** 101:9 139:16,18  
143:10**funeral** 17:4,11,14,15,16,20 18:5  
21:23 22:11,13,14,20 31:13

---

**G**

---

**G5** 5:11 20:12,13,16,19,22,23 21:12,  
16,19 28:2,3,10,14,20 29:1,16,17,24  
30:3,7,14,21,23 31:5**gag** 67:9,13**Galvan** 3:9 5:4,5 8:20 9:1,5,7,13,14  
10:25 11:18 14:7,8,16 15:3 22:3,24  
24:6,14,16 25:16,23 32:16 33:15  
34:5 37:6,23 39:25 40:7,8 41:3,6  
42:11,25 45:1 46:3 47:5 50:4,14  
52:6,7,25 61:2 63:3 67:21 70:24  
71:12,14 77:7,22 78:11,21 81:9,19  
82:21 83:12,13 84:6 85:24 86:14  
89:3,25 91:7,24 92:2,18 94:19,23  
95:8,12 96:7,14 97:11,16,24 98:2,8,  
12 100:17 101:20 103:5,22 104:2,7  
105:5,15 106:23 107:9,12 108:17  
110:15 115:7 116:11,25 117:9 118:9  
119:9,18 120:8,10,21 122:24 123:8,  
16 124:10,13,24 125:8,12,19,24  
126:10 127:21 128:7 129:13 132:19  
134:1,6,8,20 135:3 140:14,16 141:7,  
18,21 143:16 145:12 147:18 151:24  
152:10 156:17 161:10 162:23 169:4**Galvan's** 32:12 40:3,5 41:10 88:23  
89:19,20 100:21 126:14 168:20**Galvans** 6:2**Garcia** 14:17 137:12,15,23**Garza** 10:5 14:19,20,21 17:4,16  
22:1,6**gate** 13:9**gave** 75:25 76:5**general** 39:18 58:16 63:2,4 72:19  
78:20 93:15**generally** 61:3,19 62:22**Generation** 136:23 137:2**genitals** 126:11**give** 10:3 11:6 14:4,8 25:25 60:15  
76:4 96:24 122:20,21 136:14 138:2  
172:4**giving** 26:12 39:14 100:5 123:11  
166:18,19**glance** 81:5**Gloria** 8:9 72:2**God** 154:24**good** 4:1 11:6,18 13:3 14:4 17:10  
19:10 21:10,22 32:8 57:14 63:8  
78:19 91:20 124:8 167:2**gosh** 80:22 137:11**gotcha** 97:9 113:18**graduate** 15:8**graduated** 16:12 147:25**graduation** 15:19 148:2**great** 22:7 65:6 134:24 135:1 172:18**ground** 10:2**group** 23:16 117:23 118:6,11  
123:19 125:20 136:23,24 137:2,7,  
13,15 139:22 140:4,8 142:16**groups** 143:8**grow** 15:3**guess** 21:23 34:23 45:25 57:22 67:6  
72:7 113:6 124:5 136:14 143:25  
153:25 165:5,17**guessing** 165:15,16**guy** 131:5**guys** 122:22

---

**H**

---

**half** 15:23 60:23 81:7 98:21,24**handle** 18:19 19:2 48:5**handled** 21:8 34:14**hangs** 11:8**Hannah** 5:6,24 32:21 33:11,20 36:4,  
5,13,23 37:10 40:9 41:7,11 42:24  
45:18 46:4 49:2,5,9,13,19,22 50:2,  
15 51:5 60:14 61:8 65:1,7,24 66:12  
67:4 69:9,17 83:14 89:1,21,25 90:9  
92:1,11,14 93:16,22 94:6,8 95:4,9,  
21,24,25 96:5,11,14 97:24 98:8,12,  
15,18,25 99:9,22 101:6 102:15,20,  
23 103:5,11,12,18 105:5 110:15,16,  
17,23 111:1,6,23 112:6 113:1,15  
114:8,24 115:8,23 118:15,16,20,21,  
24 128:13 129:3 130:18 132:1,9,24  
133:3,6,10,15 137:16 139:13  
140:17,19 141:7,10,18,24 142:3,17  
143:15,23 145:13,21 146:1,9 147:1,  
2,20 148:12 149:2,8,9,15,18,21

150:21 151:6,25 152:4,8,12 153:3  
154:25 155:2,3,21,22 156:8 158:1,6  
159:1 160:23 161:12,19,23,25  
162:23,24 163:5,13 164:1,3,13,16  
166:5,6,15,20

**Hannah's** 92:20 93:1,3 94:10,13  
95:12 97:12 100:18 103:21 104:1  
151:3 162:13

**happen** 44:8 56:25 99:5,7

**happened** 11:7 55:3 57:4 100:22  
102:14,22 111:22 112:7,8 113:17  
116:18 136:15 146:13 155:16  
158:22

**happening** 146:11 147:5,13 162:2

**Happier** 149:18

**hard** 9:2

**Harlingen** 5:12 15:4,6,8,11,19 17:6  
23:21 117:24 136:17

**harm** 50:23

**hate** 155:12 172:5

**head** 11:5 41:10

**heading** 57:7,8

**healed** 145:24

**healing** 155:13

**Healthier** 149:14,18

**hear** 9:12 11:9,12,13 47:25 81:13  
91:2 96:4 97:20 98:6 113:24 148:17  
159:24 171:16

**heard** 11:14 41:5 58:12,18,21 68:4,5  
84:7 96:2,16 97:15 98:1 126:3,6  
148:19 159:23 170:13

**hearing** 9:2

**hearsay** 112:16 114:20

**held** 24:12 25:7

**helped** 25:13 144:1 147:22 156:9

**hereinabove** 70:16

**Hernandez** 85:8,10

**hide** 120:8

**high** 15:8,10,11,20,21 26:1 99:3  
164:17

**hint** 143:15,18 144:15

**hired** 100:17 118:15,22 119:2,4

124:18

**history** 129:14 140:18

**hold** 7:13 22:8,21 23:15 43:11,12

**holds** 18:22 119:4

**home** 15:23 17:4,11,16,20,21 18:5  
21:23 30:6,19,22 31:1,13 72:24  
73:1,8 150:9,12

**hopes** 123:19

**host** 4:1,3,4 144:1 169:21,25 170:3,  
10,19 171:20 172:9,18

**Hotel** 98:1

**hour** 9:18 14:3 60:23

**hours** 31:7,8 155:17 157:9 171:1

**house** 85:17 113:16 114:6 150:6

**housekeeping** 6:3 25:16

**Houston** 16:21

**huh-uh** 11:2 104:16

**hundreds** 60:7

**hung** 44:10

**hurt** 34:24 69:6

**husband** 9:14 10:1 17:23,24 23:8,  
22 26:24 28:20 33:6,15 34:6,7,10,  
14,16 35:7,21 36:11,13,22 37:23  
39:14,15 40:15 45:1 46:20 47:5,9,12  
48:5,16,18,24 49:6,15,20,23 50:14,  
22 51:4 52:12 53:24 54:3,14,24  
57:11 58:6 59:3 65:2,8,25 66:12,17  
67:21 68:25 69:16,24 76:19 78:18  
82:1,3 83:24 84:6 89:4 92:9 93:7,12  
95:20 96:20 99:4 101:20 102:20,23,  
25 103:11 106:2,12 118:10 123:11  
125:6 126:22 127:4,13,18 152:10  
158:9,19 166:2,13

**husband's** 21:11 23:25 36:2 37:8  
48:11 49:4 50:21 52:11 59:10 73:8  
76:20 78:24 88:21 90:3 99:8 158:16

---

**I**

---

**Ibarra** 72:2

**icon** 4:11

**ID** 73:10,20

**idea** 6:23 28:17 98:19 119:13

**identification** 14:5

**identified** 3:7 5:18 24:6

**identify** 22:3 82:23 110:13 158:24

**identities** 164:16

**identity** 163:24

**image** 4:10

**Immediately** 40:6 83:11

**imminent** 50:23 52:6,13,25

**Impact** 136:23 137:2

**imperative** 4:16

**important** 83:1

**imported** 21:19

**improper** 141:17

**inaccurate** 93:3

**inappropriate** 141:20

**inappropriateness** 141:17

**incident** 36:4,12 45:17,22,23 46:4  
66:11 69:9 93:16,21 94:5,16,19 95:5  
97:11,15,20,21 98:2,12 99:10  
100:24 102:18 103:6,10,19 105:4,5  
110:23 111:6 112:6,7 113:15 114:7,  
19,24 125:24 126:4 132:19 146:3,  
18,24 161:19,22 162:13 165:1

**Incidentally** 96:20

**incidents** 99:9 127:17

**include** 7:15

**included** 35:2 89:10

**including** 4:18

**income** 29:16

**incorrect** 24:20 53:1 72:15,16  
92:11,14,22 93:3 116:7 125:16

**incurred** 69:25

**independently** 78:23

**indicating** 93:2

**individual** 33:10 34:8 54:11 110:14  
150:19,22,24

**individually** 33:16,19 36:21

**industry** 17:1

**inexperience** 170:14



**infidelity** 163:7  
**infliction** 53:4,7,11,16 56:16 120:15  
**informant** 126:15  
**information** 30:16 69:19 75:20,23, 25 76:4 94:18 100:23 111:25 114:23 123:6 126:17 158:18 159:1,3,15,18, 21 160:1,8  
**informed** 148:9  
**initial** 135:24 136:13  
**initially** 129:1 130:21  
**initials** 23:16  
**injunction** 51:5,8,9 129:6  
**injunctive** 37:13 38:2 77:16 80:14  
**injure** 57:21  
**injury** 52:6,7,13 53:1  
**inquired** 130:17 145:11 168:13 171:7,8  
**inside** 96:1  
**instructed** 117:6  
**instructions** 108:25  
**insurance** 26:6  
**intention** 53:11 172:7  
**intentional** 53:4,6,16 56:16 120:14  
**intentionally** 52:5 109:6  
**interaction** 97:23  
**interactions** 92:2  
**intercourse** 140:16 142:21 147:17  
**International** 24:8  
**internet** 20:12,13,16 21:7,12,16 28:2,4,10,21 29:16,17 30:4,7,15 31:5 91:4 124:19,23,24 145:5  
**interrogatories** 3:8,10 12:2 107:10, 21 109:13,18 110:1  
**interrogatory** 110:12,23  
**interrupting** 77:1  
**intervening** 142:24  
**intimate** 150:21  
**intimidated** 144:21  
**intimidation** 142:10

**introduction** 148:4  
**invoicing** 18:12 19:21 20:2  
**involved** 23:10 26:18 101:6 127:3 150:17  
**involvement** 23:25 25:12 29:4 140:19  
**involvements** 133:4  
**issue** 7:8  
**issued** 32:19 64:21 65:22 105:25

---

**J**


---

**J.J.** 149:25 150:1  
**Jackie** 20:11  
**Jamie** 132:16  
**January** 107:15 108:13 110:10 120:25  
**job** 17:13,20 147:21,22  
**journals** 12:20,24 121:7  
**judge** 10:12  
**jumped** 5:22  
**junior** 16:6 99:3 144:9  
**jurisdictional** 70:17  
**jury** 10:12  
**Justice** 64:21

---

**K**


---

**keeping** 20:24  
**Kelly** 125:6,10 137:19  
**kids** 69:6 137:11  
**Kilgore** 16:4,6,10  
**Kim** 4:4  
**kind** 9:10 11:13 20:8 44:10 47:22 58:25  
**kinds** 51:9  
**kissed** 97:12  
**knew** 41:11 42:25 45:13,21 50:9 72:11,14 98:15 102:22 121:24 132:10 162:12 163:6,12,24,25

**knowing** 52:5 128:11  
**knowledge** 21:17 65:14 66:6 71:17 79:18 86:4 87:18 93:13 99:23,24 102:13 103:4,15,24 104:3 114:23 126:15 133:6,13,14,19 139:9,12 140:6,24 141:11,14 146:15 149:19, 20 165:6  
**KTA** 4:10,25

---

**L**


---

**La** 97:25 100:22 110:19 112:3 113:5  
**lack** 57:3 64:8 170:6  
**laid** 44:22 48:19  
**language** 46:18 69:20 89:1,9  
**Larry** 126:23  
**lasted** 46:12  
**laughing** 144:18  
**law** 26:17 65:25 66:11 73:7 105:5,13  
**laws** 65:14  
**lawsuit** 25:18,19 26:4 27:24 31:16 33:2,3,7,11,14,23 34:5,6,12,15,20 35:1 36:25 38:6,9,13,17 39:8,16,19 41:17 43:10 44:25 46:15 48:19 49:10,13,17 51:3,10,17,23 52:14,24 53:5,12,15,23 54:5,11,22 55:1,23 56:8,13,21 57:18 59:18,21 60:9,11, 20 61:12 62:18,21 63:11 64:5 65:13, 18 67:20 70:22,23 71:8 72:18,21 73:5,14 74:11,16,18 75:3,9 76:15 78:21 79:20 81:16,18,19 82:1,3,4, 16,22,24 83:2,19 87:1 112:9 122:10 126:24 127:3,8 128:9,11,13,17 136:4,8 140:10 144:25 145:5 153:9, 13 160:20 162:24 163:3 166:3 168:4  
**lawsuits** 26:18,21  
**lawyer** 13:21 26:7 109:4,10,11 156:20  
**lawyer's** 67:14  
**lawyers** 13:12,16 40:15 56:6 116:25  
**lay** 50:4  
**Leach** 126:11  
**leader** 24:22 125:13  
**leaders** 62:24

<p><b>leading</b> 134:9,10</p> <p><b>lean</b> 47:21,23</p> <p><b>learn</b> 41:13,20 148:10</p> <p><b>learned</b> 42:22 93:17 119:22 163:3,5,16</p> <p><b>learning</b> 110:14</p> <p><b>leave</b> 96:15 108:25</p> <p><b>leaving</b> 45:2</p> <p><b>led</b> 101:21 125:19</p> <p><b>left</b> 9:17 17:20 41:1 42:21 44:11 102:13 129:16 140:1 166:3 171:18</p> <p><b>legal</b> 87:16 119:3</p> <p><b>legally</b> 63:24 65:1</p> <p><b>Leslie</b> 139:21 140:2,3</p> <p><b>license</b> 14:9,13 22:9,10,11,13,15,17,20</p> <p><b>Licensed</b> 22:11</p> <p><b>licenses</b> 22:21</p> <p><b>lied</b> 49:20</p> <p><b>lieu</b> 37:3</p> <p><b>life</b> 15:4</p> <p><b>lifetime</b> 14:23</p> <p><b>likelihood</b> 169:4</p> <p><b>Likewise</b> 10:25</p> <p><b>limited</b> 118:13 171:9</p> <p><b>limits</b> 70:17</p> <p><b>lines</b> 88:6 154:9,19 162:1</p> <p><b>lingerie</b> 144:2 148:12</p> <p><b>linked</b> 61:23</p> <p><b>Linn</b> 36:5 46:4 65:1,24 69:17 98:9,13,15,16,18,25 99:9,22 110:16 118:16 127:13 132:25 133:3,6 139:13 141:18,21,24 142:3,9,17 143:16,23 147:2,20 149:9 150:21 153:8,12,21,24 158:1,7 162:24 166:5,6</p> <p><b>Linn's</b> 132:9 133:10,15 141:10</p> <p><b>Linns</b> 101:1</p> <p><b>listed</b> 51:22</p> <p><b>listened</b> 31:25</p>	<p><b>listening</b> 39:13,20 45:5,7 95:12 113:18</p> <p><b>litigation</b> 153:8,11</p> <p><b>live</b> 10:16 26:13</p> <p><b>lived</b> 15:17 150:6,11</p> <p><b>living</b> 24:8 150:9</p> <p><b>Livingway</b> 24:7</p> <p><b>LLC</b> 29:3</p> <p><b>local</b> 22:24</p> <p><b>locally</b> 30:8</p> <p><b>locate</b> 121:4,11</p> <p><b>located</b> 5:10,11</p> <p><b>location</b> 85:15</p> <p><b>locations</b> 5:19</p> <p><b>log</b> 30:9</p> <p><b>log-in</b> 30:16</p> <p><b>logged</b> 29:11</p> <p><b>long</b> 15:17 16:22 17:15 18:13 30:16 46:12 120:5 121:17 151:4 155:24 157:8 161:20</p> <p><b>longer</b> 29:15</p> <p><b>looked</b> 13:1 39:8 81:15 91:23 145:2,3</p> <p><b>lose</b> 90:23</p> <p><b>lost</b> 91:4 122:22</p> <p><b>lot</b> 72:17 97:2 103:2 128:9,10 155:11</p> <p><b>louder</b> 11:11</p> <p><b>lower</b> 7:2</p> <p><b>Lufkin</b> 16:11</p> <p><b>lunch</b> 9:18 78:8,10,13,14 143:9 144:13</p> <hr/> <p style="text-align: center;"><b>M</b></p> <hr/> <p><b>Madam</b> 168:17</p> <p><b>made</b> 4:23 6:11 7:5 39:15 43:4 49:22 54:24 56:19 59:3,4,5 60:4,16 64:5 69:10 79:1,14 80:5 92:25 95:20 96:14 103:5 106:25 110:14 117:15 122:1 129:1,4 135:7 139:15 145:22 166:15</p>	<p><b>maiden</b> 10:5 14:18 22:1</p> <p><b>maintain</b> 20:19</p> <p><b>maintains</b> 171:7</p> <p><b>maintenance</b> 19:4</p> <p><b>major</b> 27:7</p> <p><b>majority</b> 15:4 34:11,15</p> <p><b>make</b> 22:13 47:23 54:20 59:1 115:14 121:4,10 122:13 128:1 135:9 171:5</p> <p><b>making</b> 33:10,15,16 67:3 96:1 111:21 123:23 135:4,11</p> <p><b>man</b> 126:15 149:25 150:5,14</p> <p><b>management</b> 16:13</p> <p><b>manager</b> 131:14,16 160:9</p> <p><b>manipulate</b> 50:14 58:14,19 62:5,14 145:21 152:12,17</p> <p><b>manipulated</b> 40:9 41:6 50:10 58:8,19,20 59:8,9,16 69:15 83:13 88:25 129:3</p> <p><b>manipulating</b> 80:5 155:23</p> <p><b>manipulation</b> 42:24 43:12,18,19 44:2 46:21 50:16 61:11 62:7,8 94:22</p> <p><b>manner</b> 87:11 132:2</p> <p><b>marketing</b> 21:13</p> <p><b>marks</b> 147:14</p> <p><b>marriage</b> 145:23 148:11</p> <p><b>married</b> 127:19 144:1</p> <p><b>Martinez</b> 123:7</p> <p><b>material</b> 123:21</p> <p><b>matter</b> 25:16 61:20 65:25 66:1,10,12 74:23 94:21 105:4,6,12,13 135:25 152:1</p> <p><b>matters</b> 6:3 12:21</p> <p><b>MDI</b> 18:8,10,14,16,21 19:8 26:24,25 27:10 29:1,14</p> <p><b>meaning</b> 61:16</p> <p><b>means</b> 5:15 32:2 62:10</p> <p><b>meant</b> 7:15 35:13 59:22</p> <p><b>mediation</b> 9:8</p> <p><b>mediator</b> 9:11</p> <p><b>medical</b> 122:8,17</p>
---	---	--

**meet** 13:23 109:21 120:20 154:10  
**meeting** 76:3  
**meetings** 56:7  
**member** 137:12,15,16 140:3  
**members** 137:1  
**Memorandum** 104:17  
**memory** 75:6  
**mention** 112:12,19 155:24  
**mentioned** 111:2 112:11 126:7  
 146:10 147:19 148:13  
**mentions** 44:2  
**Mercedes** 23:21 98:1  
**message** 40:1  
**messages** 46:14,16  
**met** 120:10  
**Michael** 133:24 137:12,15,22,23  
**microphone** 4:11,12 9:9 47:22  
**Mid** 131:23  
**middle** 10:4 14:17 41:1 44:13 71:11  
 105:2 130:4,7,11  
**million** 75:9  
**mind** 67:12 140:20  
**mine** 111:4 112:4 113:13  
**minister** 24:17,21 62:22 63:23,25  
 125:12,13,19  
**ministers** 62:25 63:5,14 138:20  
**minor** 151:15  
**minute** 25:1 109:1  
**minutes** 27:6,19 28:13 52:9 60:25  
 77:5 106:17,20 127:22 158:24  
 162:15 164:14 171:1,2  
**missed** 81:12,13  
**mission** 25:13,15 101:7,12,16,17,  
 21,23 102:12,16,18,19 118:7,12  
 164:7  
**missionary** 136:18 138:8,9,10,15  
 140:22,24 142:16  
**mistake** 117:15  
**modification** 83:10  
**modified** 163:3  
**mom** 164:5  
**moment** 7:25  
**monetary** 54:4,21,25 55:12,22 60:3  
**money** 53:25 68:19 100:3,5 151:25  
 152:3,7  
**Monica** 110:19 112:24 113:11  
 114:2,6,7,23  
**monitoring** 4:5  
**month** 108:12  
**months** 16:24 83:18  
**Moore** 47:6,7,10  
**morning** 4:1 11:20 12:4 86:7 123:1,  
 7 157:10  
**mortified** 69:21 145:12  
**mortuary** 16:19,25 22:8  
**mother** 94:10  
**motion** 86:2,3,9,11,12,16,22 87:2,7,  
 11,22,23 89:21 92:8 166:21  
**motions** 12:14 38:18,20 86:8  
**mouth** 126:10  
**move** 31:15 43:25 80:9,25 83:4  
 89:18 130:11 134:21  
**moved** 90:18 129:24  
**movie** 45:2 59:14  
**moving** 21:15 107:16  
**mute** 4:11  
**Myra** 130:24 131:9,21 160:8  
**Myra's** 131:10,12

---

**N**

---

**named** 33:7,9 133:24 149:25  
**names** 14:23 102:9 129:20 131:1  
 133:15,20  
**nature** 62:2 63:13 118:8  
**necessarily** 123:20  
**needed** 18:16  
**negate** 57:3  
**nephew** 22:2  
**news** 63:13,19 147:21,24  
**newspaper** 122:25  
**newspaper's** 124:15  
**Nexus** 29:3  
**Nicaragua** 141:1 142:15,23 143:11,  
 13,14,21  
**nice** 171:16  
**niece** 22:2  
**Nix** 3:4 6:1,6,13,15,18,20,22 7:7,20,  
 22,24 8:2,7 9:4 13:6,23 14:7,12  
 32:2,13 56:3 60:22 65:3,9 66:2,5  
 73:21 74:19,24 76:24 77:1,6 78:4,6  
 79:22 80:1 81:23 82:11 87:14,16  
 91:1 93:8 97:6,8 99:14 104:23  
 105:21 106:5,20 108:4,9,14,22,24  
 109:10 112:14,16 113:7 114:20  
 117:17 120:11,14,17 121:20 123:24  
 126:5 128:4,19,22,24 129:12 130:15  
 132:23 133:14,25 134:5,14,22,25  
 135:2,3 138:24 142:8 145:17 146:14  
 148:17 149:8 150:7 151:14,18  
 152:17,21 153:2,7 156:4,14 161:5  
 163:9 165:10,20,24 167:23 168:12,  
 19 169:10,13,18 170:2,5,12,22,24  
 171:3,15,18  
**nods** 11:5  
**nonresponsive** 63:1  
**North** 24:7,17,22 25:8,12 101:18,23  
 117:23 118:11 123:8 124:25 125:11  
 136:16,17,20,21,22 137:7,12 138:5  
 139:17,18 140:3,8  
**notarized** 85:16  
**notary** 72:2 73:11,20 75:14,15,17  
 85:9,16 88:14  
**notes** 12:20,23 13:2 37:24 55:25  
 127:24 128:1 134:11,16,21 156:21,  
 23  
**noticed** 4:19  
**November** 33:3,4 35:9,21 36:10,20  
 37:17,20 38:3 39:9 49:18,23 50:1,5  
 51:3 54:12 60:9 61:7 62:6 63:4,22  
 71:25 72:21 78:19 81:17 101:13  
**number** 5:4 14:9,13 40:3 110:12  
 115:3,15,16,21,25 117:4,11,18,22  
 118:3,14,17 119:7,15,18 120:2  
 136:10 153:23,24 154:1,5 162:21

171:9  
**numbered** 122:21  
**numbers** 4:9 75:13,15 89:16 115:15  
**numerous** 41:8 73:22

---

**O**

---

**oath** 5:14 10:11 71:24 73:3 88:9,11, 12,13  
**object** 134:10  
**objection** 8:7 13:6 43:9 56:3 63:1 65:3,9 66:2 73:21 74:19,24 79:22 87:14 93:8 97:6,8 99:14 102:25 105:21 106:5 108:9 109:10 112:14, 15,17 113:7 114:20 121:20,22 123:24 126:5 128:19,22 130:14 132:22 133:12,22 134:3 138:23 142:7 145:16 146:8 148:15 149:4 150:3 151:11,17 152:14,20,24 153:6 156:3,6 161:5 163:9 165:10,20,24 167:23 168:12  
**objections** 10:14  
**obligations** 34:15  
**obtain** 22:7  
**obtained** 147:21  
**occasion** 113:14 130:11,20 132:1,5 140:9 148:9 149:10 153:7,11 157:25 158:6 161:14  
**occasionally** 138:7  
**occupation** 22:21  
**occupational** 22:21  
**occur** 43:20,21,23 101:24 146:14  
**occurred** 142:21,24 156:25 158:10 161:18  
**October** 39:25 40:4 41:2 42:20,21 43:4 44:14 46:20 48:3 49:1 56:13 65:23 66:10 101:13 106:1 130:11 153:2  
**offer** 4:5 13:17 42:1  
**offered** 156:1  
**office** 73:8 76:10,12 98:13 99:4,23 100:7,9,15 109:23 117:3 131:14,16 132:1 136:3,7,12 157:15,17,21,23 158:7,10,25 160:9 167:18,21 168:20

**officer's** 32:18  
**offices** 141:25 142:4 156:20 157:1,5  
**official** 4:13 7:5,6 25:7  
**officially** 119:3  
**officials** 47:13  
**ongoing** 113:10  
**opinion** 31:1 44:7 50:13,17,19 62:18,22 63:4,7,10 64:14,17,20 78:24 87:16 104:17,18 105:10,25 106:3 125:20 165:16,18  
**opportunity** 106:2  
**optimization** 124:19  
**oral** 5:3 11:6  
**Orbit** 19:11,13,16,19,22 20:1,5,7 21:10,11,15,18 27:12,14,20,24 29:1, 16 130:19 131:4,7,13 132:25 141:25 142:4 157:1,5,22  
**order** 4:21 5:9 13:20 31:1 32:11,19, 25 33:20,22 34:2 35:7,14 37:4 51:8 67:9,13 68:25 71:16 86:1 127:5 135:11 148:3 152:11 169:16,22 171:13 172:12  
**orders** 4:23 10:8  
**organizations** 22:25 23:11  
**original** 37:7,12 38:2 40:22 41:17 42:16 43:10 44:22 51:2 71:8,15 74:14 75:22 77:10,25 78:12,17 80:14,19,20,23 81:9,10 82:19,20 83:18 85:25 135:24,25 167:9  
**originally** 39:15  
**Oscar** 137:25 138:3,4  
**owned** 17:8  
**owner** 19:8,16

---

**P**

---

**p.m.** 40:1,5 41:2 44:15 163:23 172:21  
**pages** 81:8  
**paid** 69:25  
**pain** 70:16  
**paper** 74:5 116:20 123:12  
**paragraph** 39:7 41:1 42:3 70:12

71:10,14 76:23 77:8,9,12 85:24 87:25 88:23 90:21 91:7,9,18,24 123:14 125:25  
**paragraphs** 5:10 90:8,16  
**parent/teacher** 23:16  
**parents** 103:2 141:10  
**part** 17:21,22 18:5,6 20:6 31:12 35:12 41:21,23 84:18 88:4 139:22 141:17 144:15  
**participate** 23:1 47:2 49:5 77:23 83:5,6 84:10,21  
**participated** 23:3 44:25 45:3 101:7  
**participating** 40:21 109:17  
**participation** 27:23 34:12 37:2 80:18  
**particulars** 35:2  
**parties** 4:20 8:6 39:2 170:3  
**party** 25:17 48:2,23 49:9,22 58:4 60:16 68:12 79:5  
**pass** 129:9 156:14 169:9  
**passed** 161:13  
**password** 30:17  
**past** 13:16 15:21 51:1  
**pastor** 24:17 62:22 63:24,25 123:8, 12,16 124:11 125:6,10,18 137:19 138:11,14  
**pastors** 62:24 65:14 137:19  
**patience** 128:8  
**pause** 4:15  
**pay** 7:1  
**payable** 18:11,16 19:20  
**paying** 100:3  
**Payton** 127:13 141:13,21  
**Peace** 126:23  
**Pedro** 5:16  
**people** 63:6,14 65:15 100:17 123:20,21 130:23 135:3,9 158:24 159:8  
**percent** 19:8,16 94:18  
**perfect** 60:25

**period** 25:8 131:6,15 133:21 167:13  
**permanent** 51:4,8  
**person** 10:11 19:25 49:14 63:23  
**personal** 38:5 51:16 54:11 66:6  
 71:17 79:18 86:4  
**personally** 54:10 58:18,21 72:4  
 85:11,12 102:4 122:4 139:6 145:8  
 150:4  
**petition** 37:7,12 38:2 39:2 40:23  
 42:16 44:22 46:2 51:2 55:9,15,18  
 66:19,23 67:8,19 69:20 70:9 71:8,15  
 74:1,14 75:23 76:13 77:10,16,25  
 78:12,14,18 79:17 80:14,19,20,23  
 81:9,10 82:19 83:5,7,18,23 84:5  
 85:1,20,25 88:21 89:15 135:24,25  
 167:9,10  
**phone** 4:9 40:3,6,17 41:12 43:19  
 46:10,19 50:24 52:10 58:12,16 59:2,  
 7 76:8 113:18 121:8 128:25 130:10  
 153:23,24 154:1,5  
**phrase** 36:4 58:8 59:22 62:9  
**phrased** 103:9  
**physical** 50:23 56:20,24 57:3  
**physically** 29:19  
**picture** 140:1  
**piece** 18:22 171:13  
**place** 36:24 67:9 102:9 126:10  
**plaintiff** 3:9 5:20 33:9 39:25 40:6,7,  
 8,25 41:2,6,10 42:7,10,11,25 43:1,3  
 52:7 54:11 82:21 83:12,13 87:1  
 107:12  
**plaintiffs** 6:2 33:7 34:6 40:4 41:5  
 42:4,12,22 43:2,5 44:12,15,18 52:1  
 60:3 70:4 81:19  
**plaintiffs'** 37:12 41:13 42:5,12  
 44:17 70:14 71:7,15 74:1 80:13  
 86:1,21 87:7  
**pleading** 57:11 69:23 79:12 84:11,  
 14 89:7 135:24  
**pleadings** 12:7 56:21  
**point** 4:7 9:18 14:21 24:10 102:22  
 132:24 159:6 161:10  
**police** 126:15  
**poorly** 103:9  
**pops** 135:18  
**portion** 171:6,9  
**posed** 168:19  
**position** 50:12 58:25 62:15 69:19  
 131:4 145:20 152:11,16  
**positions** 24:12 25:7  
**post** 112:25  
**posted** 113:1 144:24 145:4 149:6  
**postgraduate** 16:17  
**posting** 6:16  
**posts** 145:6,8  
**Powell** 47:14  
**practice** 166:21  
**pray** 154:24  
**prayer** 70:12 83:22  
**pre-wedding** 148:7,10  
**preaches** 138:8  
**preceded** 97:25  
**predicate** 36:1  
**preparation** 11:19 12:5 13:4  
**prepare** 12:25 13:20,23  
**preparing** 14:2 21:14 77:23  
**presence** 47:9,12  
**present** 9:13,19 13:17 47:17 128:10  
**presented** 35:7  
**presume** 11:14,15  
**pretty** 78:19 113:10 155:20  
**prevent** 36:22  
**prevented** 166:18,25  
**previous** 42:23  
**priest** 62:22  
**priests** 63:5,13,18  
**primary** 15:5  
**principal** 43:4 47:14  
**prior** 38:14 51:10 56:7 90:2 109:10,  
 11 110:10,21 117:14 132:4,18 133:7  
 134:1,2,4 135:23 148:11 153:2  
 158:17 162:24 163:4 164:24 165:1  
**private** 66:20,25 67:5  
**privilege** 117:14 169:6  
**privileged** 13:13  
**problem** 134:22 143:15  
**proceed** 169:3,4  
**proceeding** 4:5,8,19 10:15  
**proceedings** 172:21  
**produce** 135:11  
**production** 3:9,11 12:3 107:12,23  
 120:24 121:6,19 122:2  
**profile** 4:10  
**project** 124:10  
**promiscuous** 151:13  
**proof** 56:20,24 57:3  
**property** 18:23 19:4  
**prosecution** 26:21  
**prostitute** 119:18  
**protection** 121:12  
**provide** 4:9 14:12 40:14 73:20  
 109:5  
**provided** 4:4 108:6  
**providing** 73:10 75:20,23  
**PTA** 23:12  
**PTSA** 23:13  
**public** 66:1,13,20,24 67:4 69:10  
 73:11 105:6,13  
**published** 14:7  
**pull** 122:20  
**pulled** 32:11 123:15  
**punish** 68:14,20  
**punitive** 68:4,7,12,15  
**purportedly** 6:7  
**purpose** 14:5  
**purposes** 13:15 45:16  
**pursue** 15:20 16:14,17  
**push** 99:3  
**pushed** 98:9,13  
**put** 6:8 40:18 41:9 52:14 84:14,17

106:23 117:15 126:20 127:13 153:3

---

**Q**

---

**qualification** 119:2**quality** 4:14 7:2 124:7**question** 10:17,19,20,24 11:10,14  
18:3 30:21 34:4 35:11 36:9 37:23  
47:24 53:18 70:23 73:22 82:1 86:15  
87:16 89:3 92:24 105:24 109:5,7  
110:10,17 119:24 120:20 121:20  
122:3 128:15 134:11 151:21 158:23  
162:12 167:6 168:1,19,25 170:13**questioning** 13:14 167:25**questions** 10:17 13:15 27:13 61:3  
97:3 106:24,25 108:7,8 110:3,4  
115:2 116:24 128:1,8 130:16  
156:18,19,22,24 157:2 158:23  
161:14 169:10 171:10**quick** 43:11 81:5 115:19 119:25  
162:8**Quickbooks** 19:23 20:1,20 21:1,4,  
5,18 29:11 30:3,7,14 31:2**quicker** 9:22**quickly** 107:22**Quinta** 97:25 100:22**quotation** 147:14**quote** 123:11 147:4,7**quotes** 71:11**quoting** 124:10

---

**R**

---

**raise** 91:13**ran** 20:1**Rangerette** 16:7**reach** 4:10 153:15,21**reached** 153:17**read** 41:22 42:20 43:8,11 55:8  
64:17,20,23 70:3,7,9,23,24,25  
71:10,15,18 76:22 83:11 85:20,23,  
25 87:4,25 89:24 90:2,5,8,17 92:1,4  
104:11,15,19,21,22 110:4 115:6  
125:24 151:3 156:21**read-on** 4:25**readily** 135:18**reading** 42:17 43:24 134:9,11  
156:23**reads** 39:24 88:24 105:8 110:13  
117:22 162:22**ready** 4:24 88:2 90:6,10,20 171:16**real** 18:22 19:4 43:11 115:19 119:25**reason** 22:18 92:16 93:6,11 99:25  
119:19 148:23 155:25**reasonable** 70:4**reasons** 21:13**reassurance** 6:9**recall** 9:19,24 11:7 14:1 19:15,18  
22:5 23:6 24:23,25 25:18 26:9,12  
33:22 35:6,16,19 37:21 38:15,19,22  
39:7 40:17,21 45:8,14 46:2,12,18,20  
47:15,16 48:15,18 51:6 55:11,16,17,  
20,21,22 56:12 60:13 66:16,18 67:2  
72:23,25 73:4,9,10,12,13,15,23 74:9  
75:19 76:2,14,21 85:13,15,18,22  
86:18,19 87:19 89:14,15 90:4 92:4  
96:12 100:2,3,5 101:17 107:18  
109:17 111:11,12,21 114:18 123:5,  
11 124:6,9,12 126:16,25 127:3,6,7,  
12 130:22 131:1,6,10,16,17,20  
132:15,23,24 133:17 135:22 136:3,  
6,11,22 137:1,6,18 139:16,17  
141:12 145:13 146:6,9,19 147:20,24  
154:12 157:9 158:2,3,5 161:17  
165:11 167:12,16**recalled** 35:12**recalling** 136:10**recalls** 109:2**receivable** 18:17**receivables** 18:11 19:21**receive** 76:15 77:15 86:8**received** 7:10 40:1 44:15 75:6  
120:24 155:18**receives** 18:23**receiving** 29:15 42:13 46:16 167:12**recently** 111:7 151:5 154:2,4**recess** 61:1 78:8 106:22 128:6**recitation** 41:16 52:24**recitations** 42:16**recited** 44:21**recognize** 71:4**recollection** 12:21 20:10 32:25  
38:1 74:13 75:11 86:25 87:3,6**record** 4:13,14,21,23 5:20 6:4,9 7:6  
8:25 10:1,24 73:11 128:4 135:23  
140:15 149:12 167:20 169:14  
170:23,25 171:2,3**recorded** 4:17**recording** 6:10 7:1,2,3**records** 20:20 27:1 37:24 38:5  
55:25 116:8 120:7 122:8,18 160:4,  
11,17**recounted** 43:9 95:20,23 97:11,16,  
24**recounting** 40:12 98:1 104:1**recover** 53:10,20,22 56:15 68:13**recovery** 52:1 53:6 124:17,18**red** 135:5,12,17 167:4**redoing** 135:4**redrafting** 83:6**referencing** 87:1 151:19**referred** 45:17 68:7 151:6**referring** 146:23 147:16 170:15**reflect** 56:1**reformed** 21:16**refresh** 12:21 37:25**refuse** 89:6**refused** 97:12 99:9**regard** 63:5 99:8 117:18 120:14,24  
130:15,25 131:9 136:7,16,21 140:22  
144:16 145:18 146:1 152:1,4**regret** 128:12,14**regretful** 145:22**regular** 20:13**regularly** 100:6,9,15**related** 23:11 27:24 34:11,15 36:12  
38:6 49:10 72:18,21 78:11 110:16  
120:9 122:9,18 138:5 150:8 160:20

**relating** 112:9 159:1  
**relation** 37:3 119:14 157:19  
**relations** 110:15 119:10  
**relationship** 132:12  
**relationships** 164:23,24  
**relatives** 22:4  
**relayed** 146:23,24 148:18  
**relevance** 164:18  
**relied** 92:17  
**relief** 37:13 38:2 51:10 67:17 77:16  
 80:15 87:12 166:2  
**remember** 21:20 32:9 33:1 45:11  
 46:13 72:10,13,16,20 73:24,25 74:1,  
 10 75:2,13,14,16,17,20,23 76:5,7,11  
 85:2 90:1 93:18,23 100:20 102:2,5  
 108:15,19 111:7,14,18 114:1,2  
 115:11 116:23,24 117:1 120:5  
 123:22 131:18,21,23,24 133:23  
 136:13,15 137:10 139:20 153:20  
 154:20 157:1 158:19 159:7 160:16  
 161:1,14,21 164:13 167:6,10,18,21,  
 24 168:1,4,10,14  
**remembered** 159:4,8,13,14 161:11  
**remorseful** 145:22  
**remotely** 5:8,14  
**remove** 124:23  
**removed** 124:14  
**renamed** 21:19  
**rent** 18:23  
**rental** 29:16  
**renumber** 8:4  
**repeat** 11:11 81:14  
**repeatedly** 145:11  
**rephrase** 10:21 11:15 36:9 81:14  
**replied** 154:13  
**reply** 154:16,18  
**reporter** 4:25 5:2,13 7:5 8:12,15  
 10:9 11:3 90:24 168:17,22 169:1,11,  
 15,20 170:22,25 171:12,16,23  
 172:2,6,8,13,16  
**reporter's** 4:13,16,19  
**reporting** 5:14  
**represented** 26:6  
**reputation** 57:22  
**request** 3:9 4:16 6:9 24:24 87:12  
 107:11 115:3,6,20 117:21,24 118:14  
 121:5,12 162:20,21  
**requested** 4:22 7:4 67:13,17 70:16  
 121:5  
**requesting** 169:18  
**requests** 12:2,3 25:3 109:13 115:13  
 120:24 121:2,19 122:2,5  
**require** 4:7  
**required** 57:23,25  
**reserve** 169:8  
**residence** 5:15 15:14  
**resolutions** 27:19  
**respect** 20:12,22 24:5 26:23 27:12,  
 16,20 28:2,6,16 29:3,14,17,24 30:21  
 34:5 38:16 39:18 42:15 44:20,24  
 46:10,14 47:1 50:5 51:21 53:3 56:15  
 57:6 58:17 60:3,14 61:12 62:5 78:13  
 83:22 95:25 96:13 97:10,23 100:21  
 101:7,22 102:19 103:21 104:1  
 117:21 122:7 124:19 156:18,24  
 158:16 160:23  
**responded** 155:9,10,13 156:11,12  
**responding** 166:25  
**response** 11:6 45:14 86:2,21 87:2,  
 3,7,10,13 93:2 109:12 113:6 115:13,  
 25 116:4,7 117:11 118:19 119:4  
 121:18 122:12 137:24 147:7 148:16  
 162:4 163:2  
**responses** 13:18 87:22 92:20 93:12  
 106:16,24,25 108:7,11 125:8 163:17  
**responsibilities** 20:15 131:12  
**responsive** 122:5 167:1  
**rest** 9:19  
**restrain** 35:22 36:11 69:4  
**restrained** 34:18,22  
**restraining** 32:11,19,20,25 33:19,  
 22 34:1 37:4 51:8 68:25 71:16 86:1  
 127:5  
**restraints** 35:2  
**result** 50:16 51:17 53:10 54:4  
**results** 124:20,23  
**retained** 26:7  
**return** 32:18 37:10  
**review** 12:7,10,17 35:8,14 48:22  
 74:4,5,7,10,14 86:8 106:3,13 122:13  
 159:2  
**reviewed** 11:19,21 12:5,13,20  
 37:17,19 38:1,17,20,23 56:1 74:1  
 78:19 86:9,12,16 145:8  
**reviewing** 39:7 75:11  
**revoked** 22:18  
**Richard** 5:5 9:14 13:9 40:8 41:2,6,  
 10 42:7,25 45:17 46:11 50:10,14  
 52:6,7 62:12 69:9 74:7 77:22 80:4,6  
 83:13 84:6 88:23 89:19 92:2 93:16,  
 21,22 94:2,5 95:4 102:13 103:10  
 110:14,17,22 111:1,5,22 112:5  
 113:15 114:7,24 115:7,22 125:12,19  
 132:1,5,19 134:1 137:19 138:19  
 139:9,12,15 140:12,16 141:7,21  
 143:16 144:16 145:13,19 147:17,19,  
 22 148:4 155:21,23 157:17 158:7  
 159:1 160:25 161:10,19,22 162:13,  
 23 163:5,24 165:1 166:19  
**Richard's** 80:10 99:23 141:17  
 157:23 158:7 159:6  
**Ricks** 125:25  
**ridiculousness** 171:24  
**Rimmer** 4:24 5:12 7:10,14 8:10  
 107:2 171:4,22  
**ring** 127:13  
**Road** 15:15  
**role** 20:23 21:14  
**romantic** 61:20,24 62:2 133:4  
**romantically** 150:17  
**room** 9:8 10:9 31:24 39:13 57:10  
 95:7,10,11,15,19  
**Rosa** 110:19 112:3 113:5  
**Rudy** 17:4  
**rules** 10:2  
**rulings** 10:14  
**Rumfield** 125:7,10

**rush** 172:12

---

**S**

---

**safe** 80:8 171:17**Salazar** 25:22**Salazars'** 27:24**San** 5:16,17 15:25 103:23**Sanchez** 110:18,25 111:3**sanctionable** 6:20,24**sanctions** 152:8**sat** 159:5 161:9,10**scandals** 63:12**schedule** 157:13**school** 15:5,6,8,10,11,20,21,22  
16:19,25 22:8 23:12 26:1 36:25  
43:3,5 44:13,14,16,17 47:13 48:11  
99:3 101:25 129:24 130:7,8,12  
164:17**school-based** 23:10**schools** 16:10 23:11**screen** 31:20 32:6,10 66:21 71:5  
74:4 76:25 77:9 80:15 88:23 107:8  
115:4 123:15,25 124:4 134:15**scroll** 39:3 68:23 80:11 82:9 83:21  
88:2 90:11,12,20,22 91:16 107:22  
109:14 119:17**scrolled** 75:21 77:21**scrolling** 32:18 51:1 67:7 108:24**search** 124:19,20,23 168:18**secondary** 15:6**section** 39:3,4,24 40:19 43:8,14  
44:20 51:2 70:7,24 81:4,15 83:9**seduce** 50:15 58:14 61:13,14,15,22  
62:2,7,14 145:21**seduced** 40:8 41:6 50:10 58:8,19,20  
59:9,17 69:15 83:13 88:25 129:3**seducing** 61:18,19 80:5 155:23**seduction** 42:24 43:12,18,20 44:3  
46:21 50:16 61:11,13,22 62:7,8  
94:22**seek** 52:1 106:3,12 129:6**seeking** 33:19 34:18,21 36:11,21  
51:4,15 53:6,10,20,21,24 60:2,6  
67:21 68:12,19,25 69:24 75:9 89:16  
151:25 152:4,8**send** 93:1**sending** 7:9,11**senior** 99:3**sentence** 70:3 86:5 88:22 124:6**separate** 6:10 7:1 21:9**separated** 149:3**separately** 23:25**September** 132:4**serve** 108:16**served** 107:14 108:10,11 109:15  
110:18**server** 30:12**service** 21:7 32:17 37:11 170:8**Services** 20:12,13,16 21:12,16  
28:2,4,10,21 29:17 30:4,8,15**set** 3:8 8:5 19:25 20:2 21:7,8 26:25  
27:17 28:3,7 44:1,2 89:10 107:10  
157:13,15**sex** 50:15 59:1,3,5 62:23 63:5,14  
65:2,8 69:17 145:13 152:12,18  
162:23 163:5,13**sexual** 61:20,24,25 62:2,4 63:24  
66:11 69:9 110:15 119:10,14 132:19  
140:16 147:17 162:13**SFA** 16:10**share** 20:15 103:16**shared** 32:9**sharing** 112:25**sheet** 21:6 80:12**shoot** 144:6,10**short** 6:25 130:16 161:16**shortly** 76:8 146:17 161:21,22**shot** 144:4,12**shoulder** 34:10**show** 44:19 60:22 110:8 115:12  
160:12**showed** 81:7 120:7 125:6,23 139:24**shower** 144:1,2 148:7,10,12**shown** 85:19**siblings** 129:24 130:12**sic** 42:7**side-bar** 97:6,8 121:23**sign** 72:9,20,24 79:12**signature** 71:21 85:5,7**signed** 33:24 71:24 72:7,11,15,17  
73:1,4,7 85:17,21 86:10,13,17 88:14**similar** 19:23 20:20,23 21:2 42:14  
127:10**simple** 120:20**simply** 68:13 104:7 122:3**single** 166:13**sir** 32:13 171:23**sister** 141:13**sit** 28:17 34:17 40:11 41:15 42:18  
49:8 55:17 68:1 87:9,21 105:14  
106:11 116:3 119:23 128:11**sitting** 48:18 134:12**situation** 64:8 65:24**six-pound** 99:4**skip** 83:21**slower** 11:11**small** 6:3 26:1**smiling** 144:18**social** 14:11,14 142:17**socialized** 101:4**socializing** 143:25**software** 19:23 21:2**sole** 61:10**someone's** 57:21**son** 44:13**Sonia** 3:9 5:4,5 8:20 9:1,5 39:25  
40:3,5,7 42:11,25 71:12,14 78:21  
83:12 85:24 107:12 118:9 123:16  
154:10,20**sophomore** 144:8**sort** 27:19,20 61:23



**sought** 40:2  
**sound** 11:2  
**South** 141:2,4 156:20  
**Sparrow** 15:14,15  
**speak** 9:4 40:3  
**speaker** 41:4 113:25  
**speakerphone** 113:23  
**speaking** 35:22 36:12  
**special** 70:13  
**specific** 136:2  
**specifically** 52:4 117:18 136:6,11,  
23 151:22 167:8  
**specifications** 56:17  
**specificity** 147:13  
**specifics** 56:14,18 111:16  
**spend** 31:4 121:10,21 122:4  
**spent** 14:2 39:2  
**spoke** 41:7 43:3  
**standing** 169:22  
**Star** 123:1,7  
**Starla** 94:10 125:14 153:8,12,21,24  
154:9 155:4,25 156:4  
**Starla's** 156:11  
**start** 17:7,10 18:3 26:24 107:2  
**started** 8:14 17:23,24 18:1,4,7  
19:11,14  
**starting** 78:10  
**starts** 42:3 71:11 125:25  
**state** 5:9,15,19 8:14,24 63:23  
125:11  
**state-issued** 73:10  
**stated** 42:18 71:17 82:4 86:4 171:5  
**statement** 52:18 60:16 71:24 81:10,  
18 82:16 88:16 92:2 96:1,4,5 99:25  
123:23 136:14 147:12 168:10,15  
**statements** 49:12 50:6 60:4,8 61:10  
82:4,5,23,24 83:2 88:10,17 111:22  
**stating** 124:11  
**station** 144:12 147:21,24  
**statute** 64:7,10,13  
**stay** 157:8 171:17  
**stayed** 17:21  
**stenographic** 5:15  
**step** 95:15  
**sticking** 171:25  
**stop** 34:23 40:9 69:6  
**storage** 30:10,11  
**story** 69:14 97:15  
**streaming** 20:22,23 21:7 28:14  
29:1,24 30:22,23 31:6,25  
**Street** 18:24 29:22  
**strike** 18:2 34:18  
**stuff** 9:23 63:19 72:17  
**subject** 10:13 26:20 61:20 65:20  
**submit** 92:6 105:9 107:14 126:21  
**submitted** 25:2 35:8,14 108:5  
**subsequent** 133:11 140:14,17,20  
141:23,24 142:3 146:2 155:3 164:17  
**substance** 168:13 171:8  
**sued** 74:21 75:4,5  
**suffered** 54:3,21,25 84:2 152:5  
**suffering** 70:16 143:18  
**suggestive** 132:2  
**suicide** 149:22,24 150:19,22,25  
**Suite** 5:11,16  
**summary** 126:22  
**summer** 99:22 101:25 142:16,19,23  
143:11  
**Sunday** 143:2  
**Sundays** 143:6  
**supplemental** 25:2 92:19 93:2,11  
**supplemented** 125:8  
**support** 4:6,7 77:10,24 79:9,13  
82:2,16 84:25 89:21 92:7 111:20  
127:8 128:17  
**supported** 84:5  
**supporting** 81:16,18 88:21  
**suppose** 112:2  
**Supreme** 10:7 106:4,13  
**surnames** 22:4  
**suspended** 22:17  
**swear** 8:15 79:16 88:9,11,12 89:4,6  
**switch** 9:10 37:6 110:7  
**sworn** 8:19,21 10:12 26:12 79:12  
88:13 162:18 163:17  
**sync** 170:10,15  
**synced** 170:1,4,17,20  
**system** 11:12

---

**T**

---

**table** 10:10  
**taking** 17:19  
**talk** 9:11 13:19 35:25 42:8 48:14  
84:7 94:8,10,13 110:25 111:5,8,17  
112:5,10 113:9,14 114:10 140:7,9  
154:11,24 155:1 164:3,4,5,6 168:8  
**talked** 13:12 25:23 28:25 47:5,6,10,  
13 94:15 95:4,25 110:22 114:7,14,  
25 128:9  
**talking** 8:1 10:10 11:24 27:4,8 36:6,  
16 44:3 45:6,16,18,22,23 57:12 61:6  
63:2,3 76:9 93:15 95:8 98:11 118:9  
168:2,7  
**talks** 46:16  
**tall** 96:20 98:18,23,25  
**taller** 98:21  
**Tammy** 47:14  
**tasks** 31:5  
**teach** 123:20  
**team** 4:10  
**technical** 4:6  
**technology** 32:9  
**teenager** 151:7,10  
**telling** 24:20 92:10 95:13 116:15  
**temporary** 32:11,19 37:3 51:7,8  
71:16 86:1 127:4  
**ten** 31:7,8,11 77:5 90:21 91:7 110:13  
127:23

**term** 68:4,5  
**testified** 8:21 53:17 58:6 76:2 83:6  
 101:21 158:9 159:9  
**testify** 12:22 94:21  
**testimony** 3:2 10:13 12:4,5 21:11  
 25:6,18 26:10,13 39:20 46:23 49:4  
 50:21 52:9,11 58:9 59:10 60:15 61:9  
 70:20 73:3 78:13 86:7 90:3 92:9  
 93:17 95:19 96:14 101:22 110:21  
 117:2 126:14 140:21 147:1 158:17,  
 20 159:13 161:1,3,7 162:11 163:4,8,  
 11,23 164:1  
**Texas** 5:7,12,13,16,17,25 6:2 14:8,  
 12 15:22,24 16:3,10 63:23 77:17  
 98:1 106:4,13 117:24 156:20  
**text** 154:8 155:9,18,19,24 156:1,5,  
 11,12  
**texted** 40:7 83:12 153:22 154:7  
**texts** 46:14  
**theater** 59:14  
**theory** 52:2 53:6  
**thing** 5:23 11:13 19:20 20:14 27:19,  
 20 79:2,13 124:3 126:9  
**things** 9:25 35:23 38:8 44:1,3,5  
 78:11 81:10,20 84:22 87:21 92:10,  
 13 101:9 102:14 118:8 123:21  
 129:15 156:25 158:25 166:19 168:3,  
 10  
**thinks** 16:9  
**third-party** 30:10,11  
**thought** 39:21 68:15 82:8 159:22  
**thousands** 60:7  
**threat** 52:13  
**threatened** 50:22 52:5,12,25 80:3  
 144:20  
**threatening** 41:8 42:14  
**threats** 43:4 80:5,7 129:3  
**thrust** 172:6  
**time** 4:24 5:3 9:2,10,24 10:22 14:2  
 17:17,21,22 18:5,6 19:14 20:4,6  
 25:8 26:7 31:4,12 32:24 33:14,23  
 34:2,25 38:9 39:19 46:3 49:13 53:12  
 54:2 60:12 63:11 65:11,18 66:23  
 67:15 74:7,8 76:12 78:4 79:4,7,11  
 80:22 84:3 89:7,14,24 90:2 95:2,24,  
 25 96:13 98:15 100:19 101:13  
 102:12 103:8 114:5 119:12,16 120:5  
 121:11,15,21 122:3 123:3 127:18  
 130:16 131:6,15,17 132:8 133:20,24  
 142:4 148:20 150:11 151:4 159:6,10  
 163:17 166:14 167:9,13,21 169:1,14  
 170:22,25 171:1  
**timely** 87:11  
**times** 26:10 40:14,18 68:7 73:22  
 95:16,23 96:10 136:6,9,10,12,15  
 142:9 157:11  
**Tindall** 4:4  
**title** 152:16  
**titled** 57:7  
**titles** 24:12 107:24  
**today** 4:3,5,23 8:4 12:22 13:5,20,24  
 20:18 25:7 28:17 31:17 34:17 40:12  
 41:16 42:18 46:23 48:18 49:8 50:12,  
 17 55:17 64:2 68:1 73:3 87:10,21  
 89:11 105:14 106:12 110:22 116:3  
 117:2 118:5,23 119:5,20,23 128:8,9,  
 12,17 129:6,23 130:16 162:9 165:19  
**Today's** 4:3,17 5:2  
**toggle** 115:14 118:2  
**told** 42:4 43:1 46:3 66:15,17 93:22,  
 23 94:2,23 96:8,15 99:16 104:7  
 111:14 113:8 116:15 146:5,11  
 148:24 158:19 163:12,13  
**tones** 41:8  
**tool** 4:9  
**top** 90:21  
**totaling** 55:12  
**town** 131:22  
**transactions** 19:3  
**transcribed** 169:12,16  
**transcript** 4:13,19,22 11:5 170:17  
 171:7,10,14  
**transfer** 86:3,12,17 87:7,11,23  
**trauma** 143:18  
**traumatized** 133:1 152:22 153:1,3  
 164:22  
**traveling** 36:23  
**Travis** 136:3,7 167:17,21 168:2,8,9,  
 18,20  
**treatment** 122:9  
**trial** 10:15 26:13  
**trick** 11:23  
**Trinity** 104:2  
**trip** 25:15 101:12,16,17,23 102:4,12,  
 14,16,18,19,20 103:1 140:22,25  
 141:5,10,13 142:23 143:11,13,14,21  
 164:7  
**trips** 25:13 101:8,21 118:8,12  
 136:18  
**troubleshooting** 4:15  
**true** 36:18 50:11,13 69:11 71:18  
 79:17 86:5 104:5,7 129:2  
**turn** 31:16 32:16  
**turned** 29:16 95:24 96:11 113:25  
**twelve** 91:9  
**type** 11:3 22:25 25:7,22 26:17,21  
 27:7,13 28:12 31:5 62:15 96:4,5  
 132:2 145:20 155:12  
**types** 27:16 28:9  
**typical** 31:8  
**typically** 28:6 38:8  


---

**U**

---

**Uganda** 139:17,19,20  
**uh-huh** 11:2 23:17 32:14 39:10  
 71:19 91:19,25 96:23 97:4,14  
 101:11 110:6 114:17 115:5 116:2  
 119:16 122:11 123:5,18 130:5  
 138:17 139:25 142:20,22 143:4  
 146:4 147:3,6,9,15 164:11  
**ultimately** 99:10  
**Unable** 118:21  
**uncle** 22:2  
**uncomfortable** 144:20  
**underage** 127:14  
**understand** 9:17 10:18,20 11:16,24  
 27:7,9 33:3,6,9,12 37:25 43:16  
 48:16 51:1,3,15,19 60:2,6 64:24  
 65:5 67:3,20,24 68:1,18,21,24 69:23  
 70:21 75:17 83:23 88:14 105:2,6,11,  
 13,20 117:19 119:2,8 121:1,14  
 151:21 158:9 162:17 166:1,3,5,12,

15	<b>visits</b> 171:9	<b>worked</b> 17:21,22 115:7 116:10 145:23 157:21
<b>understanding</b> 18:21,24 30:13 34:21 35:20 36:5,10,15,16,21 53:5, 9,19,23 55:5 56:14 57:15,19,23 58:2 59:20,21 66:24 67:8 68:8,9 69:3 87:9 99:2,5 105:15,24 106:1,11 110:21	<b>vital</b> 4:14	<b>working</b> 17:22 18:1,3,4,6 99:22
<b>understood</b> 37:22 53:18 61:3 69:16 79:4,7,11 95:17	<b>Vogel</b> 18:24 29:16,22	<b>world</b> 169:5
<b>undertaken</b> 124:22	<b>voice</b> 102:25	<b>worship</b> 36:24
<b>unfaithful</b> 163:25	<b>volume</b> 114:1	<b>worth</b> 5:24 54:14 70:21
<b>unintelligible</b> 58:24	<b>voluntary</b> 79:16	<b>wound</b> 150:8
<b>University</b> 15:24 104:2	<b>volunteer</b> 22:25	<b>write</b> 156:9
<b>untrue</b> 57:22,25 58:4 88:10		<b>writing</b> 149:10 156:21
<b>utilized</b> 41:4	<hr/> <b>W</b> <hr/>	<b>written</b> 3:8 11:24 107:10 108:7,19 109:5 110:9 170:8,16 171:10
<b>UTSA</b> 15:24 16:1,12	<b>Wait</b> 135:15	<b>wrong</b> 108:12 116:4 117:4,15 154:23
<hr/> <b>V</b> <hr/>	<b>waive</b> 117:13	<b>wrongful</b> 25:22
<b>Valley</b> 24:8 123:1,7 131:23	<b>waived</b> 169:5	<hr/> <b>Y</b> <hr/>
<b>Van</b> 5:11	<b>waiver</b> 171:6	<b>y'all</b> 18:4 21:6 24:5,9 32:10 39:19 45:1 55:18 100:4 101:13 127:18 134:12 169:25 170:4
<b>venue</b> 86:3,13,17 87:7,11,23	<b>wanted</b> 7:8 9:11 25:14 78:23,25 80:2 111:25 154:10 170:22	<b>y'all's</b> 34:11 100:4,18 104:14 156:20
<b>verbally</b> 4:8	<b>wanting</b> 155:11,12	<b>year</b> 15:12,23 23:13 102:3 112:8,13 114:13,15,16,17 131:8,18
<b>verification</b> 71:4,7,22 73:4 75:22, 24 77:21,24 79:8,13 85:3	<b>warned</b> 43:6	<b>years</b> 23:4,5 24:6 63:20 69:17 133:11 151:20 154:20
<b>verify</b> 158:25 159:8	<b>wash</b> 143:13	<b>yell</b> 121:23
<b>version</b> 69:13	<b>website</b> 6:18	<b>yesterday</b> 8:3 9:14,25 11:1,8 14:8 21:11 24:6 31:19,20 32:6,9,12 36:2 39:16 49:5 52:11 57:10 58:6 59:10 77:23 84:8 90:3 95:7,14 96:2,15,16 97:11,16,25 98:2 99:17 101:20 120:8 123:2,3 125:6,24 126:3,14 128:10 129:22 139:16 158:11 172:1
<b>video</b> 4:20,23 6:7,10 8:18 11:9 32:3 44:11 145:2,3 169:23 170:1,4,9,10, 18 172:1	<b>websites</b> 124:15 145:6,9	<b>yesterday's</b> 7:9
<b>videoconference</b> 4:1,3,17 134:7 169:21,25 170:3,10,19 171:18,20 172:9,18	<b>wedding</b> 127:13 144:3	<b>young</b> 56:7 127:18 149:25 150:5,14
<b>videoing</b> 11:4	<b>week</b> 9:9 31:4,8,11 143:3,4 146:18 157:4,6,7	<b>youngest</b> 130:6
<b>videos</b> 144:24 172:4	<b>Weekly</b> 143:3,4	<b>youth</b> 24:17,21,22 25:14 103:3 117:23 118:6,11 123:8,12,16,19 124:11 125:12,13,20 136:22,24 137:2,7,13,15,19 138:19,25 139:7, 10,22 140:4,7,8,9 141:8
<b>videotape</b> 169:19	<b>weeks</b> 146:19 153:19 161:18	<b>Youtube</b> 144:24
<b>virgin</b> 148:11,21,24	<b>weighs</b> 96:24	
<b>virtue</b> 36:25	<b>weight</b> 65:6	
<b>visit</b> 168:20 169:6,7	<b>Weslaco</b> 131:23	
<b>visiting</b> 141:25 142:4	<b>whatsoever</b> 56:11 65:20	
<b>visitor</b> 100:7,9	<b>wild</b> 151:7,10	
	<b>withdrew</b> 44:12	
	<b>woman</b> 126:16	
	<b>women</b> 127:18	
	<b>Woodard</b> 20:11 139:21 140:2,3	
	<b>word</b> 24:8 61:22 62:2 81:13 168:18	
	<b>words</b> 41:8 46:21,24 61:11,12 83:10	
	<b>work</b> 16:17 17:1,3,15 18:17 19:10, 13 20:8,13 100:4,18 116:8,9 157:22	

---

**Z**

---

**Zach** 4:2 169:20 172:2

**zip** 8:10

**Zoom** 10:7