

Transcript of the Testimony of
Richard Galvan

Date:

May 14, 2020

Case:

Richard Galvan vs Blaine Crews

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CAUSE NO. 2018-DCL-06387-I

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

ORAL DEPOSITION OF

RICHARD GALVAN

MAY 14, 2020

[REPORTED REMOTELY VIA VIDEOCONFERENCE]

ORAL DEPOSITION OF RICHARD 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 14, 2020, from 10:00 a.m. to 5:09 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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1 proceed.

2 RICHARD GALVAN,

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. DAVIS:

6 Q. All right. State your name for the record,

7 sir.

8 A. Richard Galvan.

9 Q. Mr. Galvan, you know that I'm Davis Chapman.

10 We have seen each other on videoconference recently,

11 correct, at the hearing on the nonsuits and such forth?

12 A. That's correct.

13 Q. Okay. We have never conversed that I'm aware

14 of; is that correct?

15 A. You and I? No, sir, not that I'm aware of.

16 Q. Okay. Am I correct in thinking that you have

17 given deposition testimony before? Sometime in the

18 past?

19 A. That is correct.

20 Q. Okay. It may have been a while. Let me just

21 go over kind of some basic predicate for this. We are

22 doing this via Zoom by agreement and by the judge's

23 order and by the Texas Supreme Court's emergency orders

24 so we're all appearing to each other on computer

25 screens, but this deposition has the same force and

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1 effect as if we were all in the room like we would be

2 traditionally with a court reporter. I'm going to ask

3 you questions and you can -- you're going to try to give

4 me answers. The court reporter, even though we're

5 recording this via video, it's very difficult for her

6 stenographically to take down two people talking at one

7 time. So I'm going to try to make sure I do my best to

8 let you finish your answers before I start a question.

9 I'd ask for you to do the same thing with me. Let me

10 finish my question before you start your answer. There

11 most likely will be many times when you know the

12 question I'm trying to get to before I finish talking,

13 but for the court's record we need to have a clear one

14 person speaking at a time pattern. If you don't

15 understand my question, Mr. Galvan, please let me know,

16 and I will try to rephrase it so that you do. If you

17 need to take a break at any time, just let me know. I'm

18 only going to ask that you finish the question that I

19 have out there before we take our break. But if you

20 don't ask to take breaks, I typically in these will, you

21 know, and ask the court reporter to go off the record

22 and take a short, you know, five-minute break every hour

23 and 15 minutes, hour and 20 minutes, let us all stretch

24 our legs. Unlike big conference rooms, I don't know

25 what kind of chairs everybody is in, but mine is okay.

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1 But sometimes you do these video things and people get

2 cramped into different spots, so I think it's good to do

3 that. I will be showing you documents at some point

4 through the Zoom app on the screen and ask questions

5 about that. What I will do is I will identify them as

6 number -- as exhibit numbers, and then at some time

7 during the next break whatever exhibits we have been

8 talking about I will save as the exhibit number that I

9 identified and I'll send that out to everybody and

10 likely email it as well. Ms. Rimmer, could you give me

11 your email address so I can email you things directly?

12 COURT REPORTER: Yes, sir. It is

13 clrimmer@yahoo.com.

14 MR. CHAPMAN: Clrimmer@yahoo.com.

15 COURT REPORTER: Yes, sir.

16 MR. CHAPMAN: All right. Thank you.

17 Q. (BY MR. CHAPMAN) All right. Do you have any

18 questions so far, Mr. Galvan?

19 A. No.

20 Q. All right. Another slight complication with

21 this is that Zoom has all this wonderful technology for

22 us to share and record, to see the videos and see each

23 other from thousands of miles away. I've done several

24 of these and not had too many slowdowns where the thing

25 hangs up. If I hang up while I'm talking to you, please

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1 let me know as best you can, and we'll try to start over

2 so we have a clear video. Additionally, Zoom has a chat

3 feature, and it may allow one or more of the

4 participants to send you private messages while we're on

5 this deposition. I'm going to ask you to notify me,

6 Mr. Galvan, if anybody sends you a private message while

7 I'm asking you questions.

8 A. Okay.

9 Q. Do you understand that, sir?

10 A. Yes.

11 Q. Okay. Who is in the room with you other than

12 Ms. Nix, Mr. Galvan?

13 MS. NIX: Sonia Galvan.

14 MR. CHAPMAN: Okay. I think it's

15 technically probably impossible probably to get all

16 three of you on camera. I would ask Mrs. Galvan, to the

17 extent she can hear me, not to -- you don't have to

18 stand there, Mrs. Galvan. I'm going to ask that -- I'm

19 taking his deposition today, and I think you're set for

20 tomorrow. In a typical deposition setting you're

21 allowed to attend as a party but you wouldn't be miked

22 up for his deposition, and I'm just going to ask that

23 you don't jump in and offer any advice for him how to

24 answer the questions. I'm going to ask you to rely on

25 the honor system that you're not over there holding up

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1 signs or waving your arms or nodding or whatever. Just
 2 let him answer the questions, and we'll get to yours
 3 tomorrow. Is that okay, ma'am?
 4 MRS. GALVAN: Yes, sir, that's okay.
 5 MR. CHAPMAN: Okay. Thank you. You can
 6 sit back down.
 7 Q. (BY MR. CHAPMAN) Okay. Mr. Galvan, with all
 8 of that out of the way, what did you do in preparation
 9 for attending your deposition here today?
 10 A. I went over some documents that I had in
 11 regards to the case, tried to get a good night's sleep,
 12 woke up and came and set up for today.
 13 Q. Okay. Can you tell me what documents you
 14 reviewed in preparation for your deposition today?
 15 A. I reviewed the -- what is it called? The
 16 request for -- I think it was a request for discovery.
 17 Q. Okay. If I say written discovery, do you
 18 understand what I'm talking about, sir?
 19 A. I believe so, yes.
 20 Q. That's where I've asked for -- there are
 21 requests where I ask for documents called requests for
 22 production, there are what are called interrogatories,
 23 which are questions that you write out answers to, and I
 24 know that you've done that, and then there are requests
 25 for admissions asking you to admit or deny. Are those

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1 the documents you're talking about in this category?
 2 A. I believe so, yes.
 3 Q. Okay. What else? What other documents did you
 4 review in preparation for your deposition today?
 5 A. That's about it.
 6 Q. That's about it?
 7 A. Yes, sir.
 8 Q. Okay. Did you review any of the lawsuit
 9 pleading that you have filed in this case?
 10 A. No.
 11 Q. Okay. You didn't review your petition?
 12 A. I reviewed my affidavit.
 13 Q. Okay. Have you reviewed both of the affidavits
 14 that have been filed in this case?
 15 A. Yes.
 16 Q. Okay. Did you review your wife Sonia's
 17 affidavits?
 18 A. Not -- no, not in its entirety.
 19 Q. Did you review -- I'm sorry. Go ahead.
 20 A. I was just focusing on mine.
 21 Q. Okay. Did you review any of the motions that
 22 have been filed by the lawyers in this case?
 23 A. No, sir.
 24 Q. Okay. Did you review any of the materials
 25 filed at the Court of Appeals, including the Court of

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1 Appeals' written opinion in this case?
 2 A. No, sir.
 3 Q. Have you reviewed any journals or notes that
 4 you've kept about this case?
 5 A. No, sir.
 6 Q. Have you kept any journals or notes about this
 7 case?
 8 A. No.
 9 Q. I'm not talking about communications with your
 10 lawyers.
 11 A. No.
 12 Q. Okay. Did you have any conversations with
 13 anyone in preparing for your deposition here today?
 14 A. I talked to my attorney.
 15 Q. I don't want to know anything that you talked
 16 about with any of the attorneys that you have had in
 17 this case. So to the extent that I slip up and ask a
 18 questions that might include a conversation with an
 19 attorney, I don't want you to tell me that. That's
 20 privileged. And certainly I will try to ask the
 21 questions in such a way that it avoids that, but I want
 22 you to know ahead of time that I'm not asking about what
 23 you talked about confidentially with your attorney. Do
 24 you understand that?
 25 A. Yes.

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1 Q. Okay. Did you review any emails in preparation
 2 for your deposition today?
 3 A. Just the one that was sent out for today's
 4 meeting from the -- from KTA.
 5 Q. Okay. Very good. Do you have an idea, a rough
 6 idea, as to how long you spent preparing for your
 7 deposition today?
 8 A. I don't.
 9 Q. Is it more than an hour?
 10 A. I'm not sure, sir.
 11 Q. Okay. Was it all day yesterday?
 12 A. Again, I don't have an exact estimate of time.
 13 Q. All right. I asked you your name, but go
 14 ahead -- Mr. Galvan, go ahead and give me your full
 15 name. I don't think I ever got a middle name for you.
 16 A. Richard Edward Galvan.
 17 Q. Okay. Are you a junior or a senior or a third
 18 or anything like that?
 19 A. No, that's it.
 20 Q. Okay. What is your driver's license number,
 21 Mr. Galvan, if you know?
 22 A. I don't know it.
 23 Q. Is that something you can locate and provide to
 24 counsel to provide to me at a later date?
 25 A. Yes.

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1 Q. Okay. Do you know your Social Security number
2 off the top of your head?
3 A. I do not.
4 Q. Okay. Can you also locate that and provide
5 that to counsel for me?
6 MS. NIX: Objection; form. With the
7 exception of the last three digits.
8 Q. (BY MR. CHAPMAN) Okay. Mr. Galvan, have you
9 gone -- in your lifetime -- well, what's your date of
10 birth?
11 A. July 17th of 1969.
12 Q. You're about to be 51; is that right?
13 A. I am 50 right now, yes.
14 Q. Okay. During your lifetime, Mr. Galvan, have
15 you gone by any other names?
16 A. No.
17 Q. Where did you grow up, Mr. Galvan?
18 A. Where do you mean by grow up, sir?
19 Q. What town? What part of the world? What town
20 did you grow up in?
21 A. Grow up to what age? Can you be more specific?
22 Q. Sure. From zero to five -- well, where were
23 you born? Let's start with that.
24 A. Born in Douglas, Michigan.
25 Q. Okay. How long did you live in Douglas,

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1 Michigan?
2 A. I think to either the first or second grade.
3 Q. Okay. Where did you move to after that?
4 A. Moved to Houston.
5 Q. Okay. Do you remember how old you were?
6 Second grade, you said?
7 A. It's either first or second grade.
8 Q. And how long did you stay in Houston?
9 A. Until I gradu-- to 1987/1988, roughly.
10 Q. Is that when you graduated from high school,
11 give or take?
12 A. '87.
13 Q. Okay. And then sometime between '87 and now
14 you've relocated. You relocated to Harlingen and/or
15 Brownsville and/or Mercedes, correct?
16 A. That's correct.
17 Q. When did you move -- when did you move to that
18 area of Texas?
19 A. In 1999, I think, or maybe '98, roughly.
20 Q. Where did you go to high school?
21 A. I went to Saint Thomas High School in Houston
22 and Bellaire High School in Houston.
23 Q. Okay. Did you graduate from high school?
24 A. Yes.
25 Q. Okay. Which high school did you graduate from?

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1 A. Actually, I had to get my GED in the summer of
2 that -- of 1987.
3 Q. Okay. Why was that?
4 A. Because my transfer, from what I understand and
5 what I can recollect, from private school to public
6 school didn't have all the credits, so I went to --
7 [unintelligible]
8 Q. Okay. Saint Thomas being the private school
9 and Bellaire being a public school; is that correct?
10 A. Yes, sir.
11 Q. Okay. After you graduated high school did you
12 go off to college somewhere?
13 A. I went to college in -- [unintelligible] -- for
14 six months to play baseball, and then I was there for a
15 semester, and then I went to Texas Southmost College for
16 two years to play and I attended that school.
17 Q. Okay. You hung up on me there for the very
18 first part of that answer. Where did you go to play
19 baseball initially?
20 A. I went to University of Texas Pan American in
21 Edinburg --
22 Q. Gotcha.
23 A. -- to try to make the baseball team.
24 Q. Gotcha. And then the second institution you
25 went to was -- could you refresh my --

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1 A. Texas Southmost College.
2 Q. Okay. Where is that located?
3 A. In Brownsville.
4 Q. Okay. Did you graduate from college, sir?
5 A. No, I didn't.
6 Q. Okay. What did you study in college? Was
7 there a particular major that you had?
8 A. I was studying international business.
9 Q. What was the last year that you attended
10 college?
11 A. I guess it was my -- 1993 or so, '92 maybe.
12 Q. Okay. After you stopped attending college did
13 you then leave and become employed somewhere?
14 A. I was working while in college as well and
15 worked while I was not in college.
16 Q. Okay. What job did you have in college?
17 A. I was washing cars for a rental company and
18 also doing some collections for an auto dealership.
19 Q. Okay. What was the first full-time job you had
20 after you left college?
21 A. I washed cars most of the day, but I guess my
22 first full-time job was working for the rental -- the
23 car rental company.
24 Q. Okay. Which company was that?
25 A. Montgomery Ward Auto Rent.

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1 Q. Okay. Which city was that in?
 2 A. Austin.
 3 Q. Okay. And do you remember the years that you
 4 did that?
 5 A. I don't.
 6 Q. Okay. How long did you live in Austin just in
 7 general?
 8 A. I think until 1999 or 1998.
 9 Q. Okay. What all jobs did you have while you
 10 lived in Austin?
 11 A. Let's see. Working for Montgomery Ward Auto
 12 Rent. I worked for a guy that sold plants. I did that.
 13 I worked for a company that sold parts to
 14 manufactured -- manufacturing companies.
 15 Q. Do you remember the name of that business?
 16 A. I don't.
 17 Q. Okay.
 18 A. I worked in the warehouse. Then I worked for a
 19 company called Texas Student Guaranteed Loan
 20 Corporation, and I was a -- and then I worked for a
 21 Mercedes dealership doing some collections in Austin,
 22 and then I worked for Dell Computer Corporation.
 23 Q. Is Dell Computer the last job you had living in
 24 Austin?
 25 A. Yes.

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1 Q. Okay. What years did you work at Dell?
 2 A. Either '94 or '93 to about 2002 or '03.
 3 Q. So about seven or eight years, correct?
 4 A. Could have been a little bit more. I think it
 5 was closer to nine or ten.
 6 Q. What did you start at when you started working
 7 for Dell? What position did you start at?
 8 A. I was an inside sales rep.
 9 Q. Okay. And if you could, walk me through from
 10 when you started as this inside sales rep at Dell, the
 11 positions you held there over the intervening, you know,
 12 eight years or slightly longer?
 13 A. I was an inside sales rep for a number of
 14 years. I don't recall. And then I became an account
 15 executive, and at the end of my time with Dell I was a
 16 regional account manager.
 17 Q. Is that a sales position?
 18 A. Sales and operations.
 19 Q. Okay. Did you obtain any technical
 20 certifications or licenses while you were at Dell?
 21 A. No.
 22 Q. As we sit here today do you have any technical
 23 certifications or licenses?
 24 A. No.
 25 Q. You left Dell Computer as a regional account

Page 20

1 executive. What job did you take after that?
 2 A. After that I worked for a company called Future
 3 Electronics out of Montreal, Canada.
 4 Q. How long did that last?
 5 A. Maybe twelve months.
 6 Q. Okay. Where was that job located?
 7 A. In -- well, their corporate office was in
 8 Montreal. At that time in 19-- it was located here in
 9 the Rio Grande Valley.
 10 Q. Okay. So did you move from Austin to the Rio
 11 Grande Valley for that job?
 12 A. No.
 13 Q. Okay. Where did you move to after you left
 14 Austin?
 15 A. I was working for Dell while I was living in
 16 the Rio Grande Valley.
 17 Q. Oh, okay. So while you were with Dell you
 18 relocated to the Rio Grande Valley, correct?
 19 A. Yes, sir, correct.
 20 Q. And you were a regional sales account person
 21 for the Rio Grande Valley area; is that right?
 22 A. For who?
 23 Q. For Dell.
 24 A. No. No, I was a -- I was a regional account
 25 manage for Dell Latin America.

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1 Q. Okay. What was your territory?
 2 A. Mexico to Argentina.
 3 Q. Okay. Did that involve travel down to those
 4 areas?
 5 A. Quite extensively.
 6 Q. Okay. How much were you traveling per year?
 7 Do you have any recollection?
 8 A. Anywhere between three and four weeks a month.
 9 Q. Okay. And what were the years that you had
 10 that job and those travel requirements?
 11 A. Again, it was probably -- it was towards the
 12 latter part of my time with Dell. I don't know exactly.
 13 Q. You think your time at Dell ended around
 14 2003/2004; is that right?
 15 A. That's what I'm estimating.
 16 Q. Okay. And then you went to work for this
 17 company based in Montreal for about a year, correct?
 18 A. That's to my recollection, yes.
 19 Q. At that time did you -- for that company did
 20 you office primarily in the Rio Grande Valley?
 21 A. Yes.
 22 Q. Did you travel regularly to Montreal?
 23 A. I went a few times. I went up -- they had
 24 training when I first started, and I think I went
 25 another time but I can't recall.

Page 22

1 Q. Was that a sales type job as well?
 2 A. It was sales and operations.
 3 Q. Okay. What type of operations were you looking
 4 over at that job?
 5 A. There was a program called First, I think, or
 6 FIFO. First In First Out. It dealt with --
 7 Q. Inventory management?
 8 A. Yeah, it dealt with inventory management and
 9 assisting replenishment of electrical components for
 10 manufacturing facilities and analyzing the total cost of
 11 ownership for that and assisting in reducing costs.
 12 Q. And then that job -- forgive me. I've
 13 forgotten the name of the company you said. But the
 14 Canadian company, what did you leave that job to go do?
 15 A. That job -- from there I went to another
 16 electronics company called America 2 based in Florida.
 17 Q. Okay. What was your position with America 2?
 18 A. Sales and operations.
 19 Q. What was their -- what kind of -- what kind of
 20 company -- what kind of business was America 2 in?
 21 A. It was again an electronic --
 22 Q. Manufacturing company?
 23 A. -- sales company. No, all sales. Just selling
 24 electronic components to manufacturers.
 25 Q. Gotcha. And how long did the job with

Page 23

1 America 2 last?
 2 A. Not that long. I'd say maybe -- maybe four or
 3 five months. I'm not sure.
 4 Q. Does that get us up to maybe 2005 then, do you
 5 think?
 6 A. Oh, no. Actually, I don't know, to be honest
 7 with you.
 8 Q. Okay. You don't remember exactly what year it
 9 was when you left this America 2 job but it lasted six
 10 months, five months; is that fair?
 11 A. I would think so, yes.
 12 Q. What was the next job that you had following
 13 America 2?
 14 A. The next job I had, I got -- I was hired for a
 15 company -- and I forget the name -- to work with General
 16 Motors, and it was an electronics -- electrical
 17 components sales company as well, and my main function
 18 was to work with G.M.
 19 Q. Okay. Was that job based in the Rio Grande
 20 Valley?
 21 A. I was living in the Rio Grande Valley, yes, but
 22 I had to travel up to various locations in the United
 23 States to meet with individuals that were in
 24 manufacturing with General Motors.
 25 Q. Okay. Do you remember the year or years that

Page 24

1 you held this job for the electronics company supplying
 2 parts to G.M.?
 3 A. No.
 4 Q. Okay. Do you know when that ended?
 5 A. No.
 6 Q. Okay. What job did you take after that job?
 7 A. Then I started my own business.
 8 Q. Okay. What year was that?
 9 A. I started a company actually during the time I
 10 was working, and that company was really just a side
 11 company, repaired computers and sold computers and those
 12 types of things. So when I stopped working for that
 13 last company I just -- I did that full time.
 14 Q. Okay. The company that was the computer repair
 15 company that you started, what was that called?
 16 A. MD International. MDI.
 17 Q. Okay. And when did you start that?
 18 A. In 2002/2003.
 19 Q. Okay. While you were at Dell?
 20 A. I believe so.
 21 Q. Okay. And that was a computer repair facility
 22 or store or something of that nature?
 23 A. Just offering some computer repairs at the
 24 time.
 25 Q. Okay. Did you have a storefront or anything

Page 25

1 was this you bring it to me?
 2 A. Not when I started, no.
 3 Q. Okay. Were you doing the work yourself or did
 4 you have employees?
 5 A. No, I did it. I mean, it was relatively --
 6 things that I considered simple at the time, like
 7 changing a hard drive or something with hardware.
 8 Q. Gotcha. Did MDI ever end up having any
 9 employees in addition to yourself?
 10 A. Once we moved from -- into a facility we did
 11 have employees, yes.
 12 Q. What was the date where you went from having
 13 MDI as a side business and keeping these other jobs to
 14 going full time with MDI? When did that happen?
 15 A. I don't recall.
 16 Q. Okay. Would it have been later than 2005?
 17 A. I don't know. I don't remember.
 18 Q. Was MDI organized as a C corp or an LLC or do
 19 you know?
 20 A. It's an LLC.
 21 Q. In Texas?
 22 A. That's correct.
 23 Q. Were you the sole owner of MDI?
 24 A. No, I'm 50 percent owner.
 25 Q. Who owns the other 50 percent?

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1 A. My wife Sonia.
 2 Q. Okay. So we have been talking about your
 3 employment history kind of, leaving high school in
 4 Houston through -- we've gotten through somewhere in the
 5 mid 2000s. At some point you got married, correct?
 6 A. That's correct.
 7 Q. This is the worst question I can ask to any
 8 deponent when their wife is in the room. When was that?
 9 A. June 24th, 2000.
 10 Q. Very good. I've gotten -- I've gotten a lot of
 11 witnesses in trouble with that question over the years.
 12 A. Yeah, I thought you would.
 13 Q. So you have passed with flying colors for
 14 today, sir. Good job. Where were you living when you
 15 got married? Was that in Austin or was that down in the
 16 Rio Grande Valley?
 17 A. No, I was -- I was down in the Valley when we
 18 got married. I had moved. I was working, working for
 19 Dell.
 20 Q. Okay. You have been married just one time,
 21 correct?
 22 A. That's correct.
 23 Q. Okay. And your wife is Sonia Galvan?
 24 A. Yes.
 25 Q. Okay. Is she from the Rio Grande Valley area

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1 herself?
 2 A. I believe she's lived in the Rio Grande Valley
 3 for the majority of her life, but I also know that she
 4 lived in Houston as well.
 5 Q. Okay. Do you have any -- other than your --
 6 you have -- how many children do y'all have?
 7 A. We have three children.
 8 Q. Okay. Give me their names and ages right
 9 quick.
 10 A. Ellianna Galvan is 15, Elijah Galvan is 14, and
 11 Esteban, with a B, is eight.
 12 Q. Okay. Other than your wife and your children,
 13 do you have any relatives in the Rio Grande -- in
 14 Cameron County specifically?
 15 A. I have my wife. I'm sorry. My parents are
 16 here.
 17 Q. What is their name? What are their names?
 18 A. David Galvan and Cynthia Galvan.
 19 Q. And I didn't mean to cut you off. I just
 20 wanted to make sure I remembered to ask their names. I
 21 apologize. What other relatives do you have that live
 22 in Cameron County?
 23 A. I have uncles and aunts and some cousins.
 24 Q. Okay.
 25 A. And then my wife's family. But other than

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1 that, that's all.
 2 Q. Okay. I'm not going to ask you for an
 3 exhaustive list of every cousin, uncle and aunt that you
 4 have in Cameron County. That might be very hard to do
 5 anyways. But in general can you give me the last names
 6 of your relatives that you can recall that live in
 7 Cameron County?
 8 A. Galvan. Marin. M-a-r-i-n. That's about it, I
 9 think.
 10 Q. Thank you. All right. We were talking about
 11 MDI. Is it MDI International or just MD International?
 12 A. MD International.
 13 Q. Okay. I'll call it MDI, and you understand
 14 what I'm talking about, correct?
 15 A. Okay.
 16 Q. Has that company always been owned 50 percent
 17 by you and 50 percent by your wife Sonia?
 18 A. Yes.
 19 Q. Okay. Do you have a company agreement that you
 20 know of for that entity?
 21 A. What do you mean by company agreement?
 22 Q. Do you have a written agreement entitled
 23 Company Agreement that lays out the rules for operating
 24 that company?
 25 MS. NIX: Objection; form. Go ahead and

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1 answer.
 2 THE WITNESS: I don't know.
 3 Q. (BY MR. CHAPMAN) Okay. Do you keep -- is MDI
 4 still in business?
 5 A. It's still an active company but it has -- it's
 6 not in business.
 7 Q. But it's maintained as an active entity with
 8 the Texas Secretary of State?
 9 A. Yes, that's correct.
 10 Q. Okay. Does MDI have officers or members?
 11 A. I don't recall.
 12 Q. Okay. Do you keep a set of written corporate
 13 books for MDI?
 14 A. I don't know.
 15 Q. Who would know?
 16 A. I don't know.
 17 Q. Does MDI currently have any employees?
 18 A. No.
 19 Q. Since it's not actively in business, have you
 20 received any compensation from MDI in the last two
 21 years?
 22 A. What do you mean by compensation? Are you
 23 talking about paychecks?
 24 Q. Has MDI, MDI LLC, made any distributions to you
 25 as an owner of the company?

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1 A. Yes, I believe so. I don't -- I need -- I
 2 can't answer. I don't know if I understand the
 3 question.
 4 Q. Okay. The question I'm asking is that you said
 5 that -- you said that MDI was no longer in business, and
 6 so I asked you since it was no longer in business --
 7 well, let me ask you this question. When did MDI quit
 8 actively operating as a business?
 9 A. MDI -- all MDI does now is it owns a building
 10 and that building is being rented. That's it.
 11 Q. I gotcha. All right. That helps. I gotcha.
 12 What is the address of MDI's building?
 13 A. It's 311-D Vogel -- V-o-g-e-l -- Drive,
 14 Mercedes, Texas, 78570.
 15 Q. Is that the building you're in today?
 16 A. No, sir.
 17 Q. Okay. All right. Other than the real -- other
 18 than that building with the address you just identified,
 19 does MDI own any other property of any significance?
 20 A. No, sir.
 21 Q. Okay. So if you've received distributions as
 22 an owner of MDI, it would just be rental income from the
 23 real property?
 24 A. That's correct.
 25 Q. Okay. How long did MDI operate as a computer

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1 repair business?
 2 A. I don't know. Maybe until 2008 or so or '09.
 3 Q. Did it ever have like a physical storefront
 4 location or physical space where people brought things
 5 to you?
 6 A. Yes, it did. It was in -- it was in -- it was
 7 in -- I think we started in Harlingen, and then -- did
 8 we, Sonia? I don't remember. I'm not sure if we
 9 started in Harlingen or started in La Feria.
 10 Q. Did it end up being in that building on Vogel
 11 Street that you just talked about?
 12 A. No, sir. MDI doesn't -- it owns it but there's
 13 no operations again. Remember?
 14 Q. Yeah.
 15 A. So yeah.
 16 Q. Did MDI ever have operations in that Vogel
 17 building?
 18 A. No.
 19 Q. Okay. All right. You've owned some other
 20 businesses between -- well, let me ask you this
 21 question. Strike that.
 22 While you were still employed for Dell and
 23 the other companies subsequent to Dell that you were
 24 testifying about earlier, did you have any other side
 25 businesses that you formed other than MDI?

Page 32

1 A. No.
 2 Q. Okay. At some point you formed some other
 3 business start-ups, correct?
 4 A. Correct.
 5 Q. All right. What was the first one you formed
 6 after MDI?
 7 A. Orbit Broadband.
 8 Q. And what type of business was Orbit Broadband?
 9 A. It was an internet service provider.
 10 Q. Okay. And where -- was that based in the Rio
 11 Grande Valley?
 12 A. Yes, sir.
 13 Q. Okay. And were you -- well, were you and your
 14 wife the sole owners of Orbit Broadband?
 15 A. Yes.
 16 Q. Was it 50 percent each as well?
 17 A. Yes.
 18 Q. Okay. When was Orbit Broadband founded?
 19 A. 2008.
 20 Q. Okay. And is Orbit Broadband still in
 21 existence with the Texas Secretary of State's office?
 22 A. No, it is not.
 23 Q. All right. When did you wrap up Orbit
 24 Broadband as a corporate entity?
 25 A. 2014 or '13 or '15. I don't remember.

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1 Q. That's fine.
 2 A. '15. '16.
 3 Q. Somewhere in there. Somewhere in the mid
 4 2000s.
 5 A. Right.
 6 Q. Why did you shutter Orbit Broadband?
 7 A. I changed the -- I changed it to G5 Internet
 8 Services really just -- it was thought that broadband
 9 sounded slow, and so we changed it. It was changed to
 10 G5. That was really it. Just kind of a marketing deal.
 11 Q. Okay. Fair to say then Orbit Broadband just
 12 turned into G5 just in laymen's terms?
 13 A. I would think so, yes.
 14 Q. Okay. Whatever assets and operations you had
 15 from Orbit at some point became the operations and
 16 assets of G5, correct?
 17 A. That's correct.
 18 Q. Okay. Do you know if you did any formal
 19 buy/sell agreement or asset transfer agreement to make
 20 that happen?
 21 A. I don't recall.
 22 Q. Okay. Did you use a lawyer to effect that
 23 transaction or did you do it yourself?
 24 A. I don't recall.
 25 Q. Okay. Now, I believe -- do you have -- okay.

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1 From the time that you had MDI until you formed Orbit
 2 Broadband in 2008 and that went to somewhere in the mid
 3 2000s, correct? I mean, mid 20-- mid teens, 2013 to
 4 '16, correct?
 5 A. To the best of my recollection.
 6 Q. Okay. During that time period did you have any
 7 other businesses that you started?
 8 A. Not during that time period.
 9 Q. Okay. You also have a business now called G5
 10 Streaming; is that right?
 11 A. That's correct.
 12 Q. When did that start?
 13 A. 2018 or '19. '18. Roughly around there.
 14 Q. And I'm looking at a discovery response that
 15 you sent over to my office yesterday. Are you the 100
 16 percent owner of G5 Internet Streaming?
 17 A. G5 Streaming and Internet, yes.
 18 Q. Okay. And G5 Internet you own 50 percent. Is
 19 that also owned 50/50 with your wife Sonia?
 20 A. Yes.
 21 Q. Okay. All right. Going back to MDI, did MDI
 22 ever have any written policies and procedures manuals?
 23 A. Not that I can recall.
 24 Q. Did it ever -- did you keep -- well, let me
 25 strike that.

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1 What employment records did you keep with
 2 MDI?
 3 A. I don't have any employment records.
 4 Q. Did you ever keep any employment records with
 5 MDI?
 6 A. I don't have any employment records.
 7 Q. Okay. I appreciate that. To be clear here,
 8 did you ever keep any employment records for MDI?
 9 A. I don't recall.
 10 Q. How many -- how many employees did MDI have at
 11 the most?
 12 A. I don't recall.
 13 Q. Okay. Did you ever have any W-2 employees that
 14 would report as a W-2?
 15 A. Again, I don't recall.
 16 Q. Did you have independent contractors that
 17 worked for MDI?
 18 A. I don't recall.
 19 Q. Okay. How many employees does G5 Internet
 20 Services have?
 21 A. None.
 22 Q. Okay. How many -- has G5 Internet Services
 23 ever had any employees?
 24 A. It did.
 25 Q. Okay. How many employees has G5 Internet

Page 36

1 Services had since 2015 or thereabouts when it was
 2 started?
 3 A. I don't know.
 4 Q. Do you remember any of their names?
 5 A. Yes, I do.
 6 Q. What are the names that you remember?
 7 A. Ricardo Gonzales. Johnny Cerda. Myself. My
 8 wife Sonia. That's all I can remember.
 9 Q. Okay. Did you take a salary from G5 Internet
 10 Services?
 11 A. I did.
 12 Q. Okay. Did your wife Sonia take a salary from
 13 G5 Internet Services?
 14 A. I believe so. I'm not sure.
 15 Q. Does G5 Streaming have any employees?
 16 A. Yes, it does.
 17 Q. How many employees does it have?
 18 A. Eight.
 19 Q. Okay. Does G5 Streaming keep the same physical
 20 offices as G5 Internet Services?
 21 A. No, G5 Internet Services doesn't have an
 22 office.
 23 Q. Okay. Does G5 Internet Services have a
 24 business office?
 25 A. Can you explain what a business office is

Page 37

1 compared to?
 2 Q. Sure. Does G5 Internet Services have any
 3 physical office where its business is connected?
 4 A. Oh, yeah. It's got an office in -- there at
 5 311-D Vogel Drive. It has about 1,000 square feet.
 6 Q. And that's the building that's still owned by
 7 MD International, correct?
 8 A. That's correct.
 9 Q. Okay. And G5 Streaming, where is its offices?
 10 Where are its offices?
 11 A. Right now it's at everybody -- all the
 12 employees' homes.
 13 Q. Fair enough. We're all doing a bit of that.
 14 Before this malady affected us all, where was G5
 15 Streaming's offices?
 16 A. At 222 East Van Buren, Harlingen, Texas, Suite
 17 502.
 18 Q. And that's where you are today, correct?
 19 A. That's correct.
 20 Q. Okay. For G5 Internet Services, did G5
 21 Internet Services ever keep any written policies or
 22 procedures manuals?
 23 A. I don't recall.
 24 Q. Any employment manuals?
 25 A. Again, I don't recall.

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1 Q. Is there anybody that would know other than
2 yourself?
3 A. No.
4 Q. With respect to G5 Streaming, does G5 Streaming
5 keep any written policies and procedures manuals?
6 A. I don't -- I don't recall.
7 Q. Would anybody else know for G5 Streaming?
8 A. Not that I know of.
9 Q. Okay. Do you keep a set of corporate books for
10 G5 Internet Services?
11 A. I don't -- I don't know. I don't recall.
12 Q. Okay. Did G5 Internet Services -- does it have
13 a company agreement?
14 A. Can you explain what a company agreement is,
15 please?
16 Q. Sure. It's often called an operating
17 agreement. It lays out the ownership, voting, notice to
18 members, meetings, all the corporate formalities and how
19 they should occur. Does G5 Internet have anything like
20 that?
21 A. I don't know.
22 Q. Is there anybody else that would know?
23 A. Not that I know of.
24 Q. Does G5 Streaming have any -- keep any
25 corporate books?

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1 A. I think I've already answered that question. I
2 don't know.
3 Q. Okay. Do you retain third-party accounting
4 services for G5 Internet Services?
5 A. No.
6 Q. Who does the accounting for G5 Internet
7 Services?
8 A. G5 Internet Services -- oh, like billing?
9 Q. Who maintains your accounting records for G5
10 Internet Services?
11 A. Is accounting finance?
12 Q. Sure.
13 A. Okay. Sonia.
14 Q. That's your wife?
15 A. That's correct.
16 Q. Does she also do the books for G5 Streaming?
17 A. That's correct.
18 Q. Okay. For those two entities do you have a
19 third party prepare your taxes for those entities?
20 A. Yes, sir.
21 Q. Okay. Who is that?
22 A. His name is Chris Villarreal.
23 Q. I'm sorry. Chris who?
24 A. Chris Villarreal.
25 Q. Okay. Thank you.

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1 A. You're welcome.
2 Q. Thank you for giving me what I would consider
3 the West Texas pronunciation of that name. Okay. Where
4 does he office? In Harlingen?
5 A. That's correct.
6 Q. Okay. Does he also do your taxes, your
7 individual taxes?
8 A. Yes.
9 Q. Okay. Do G5 Internet Services and G5 Streaming
10 maintain separate operating bank accounts?
11 A. Yes.
12 Q. How about MDI? Does it have a separate bank
13 account?
14 A. Yes.
15 Q. Where do you bank for those businesses?
16 A. All three are at Frost Bank.
17 Q. Very good. All right. Mr. Galvan, with
18 respect to G5 Internet Services, were you the person --
19 to the extent that it had employees, were you the person
20 that hired and/or fired those employees?
21 A. There was multiple people that had that
22 responsibility.
23 Q. Okay. Do you remember who else had that
24 responsibility for G5 Internet Services?
25 A. People that -- finance manager would, you know,

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1 hire and fire. There's an office manager position, I
2 believe. There's tech support supervisor.
3 Q. Who were the -- who was the finance manager?
4 A. We had -- who is it now? It's Sonia.
5 Q. Well, okay. Was there -- back at the time that
6 G5 Internet Services had employees who was the finance
7 manager?
8 A. I don't recall.
9 Q. Okay. Who was the office manager at that time?
10 A. I don't recall.
11 Q. With respect to G5 Streaming, who has the
12 ability to hire and fire employees?
13 A. The same, same individuals.
14 Q. Okay. Do you remember their names?
15 A. Myself, Sonia Galvan, Johnny Cerda, Ricardo
16 Gonzales.
17 Q. Thank you. With respect to MDI, to the extent
18 it had employees at some time, were you the person that
19 hired and fired those employees?
20 A. I don't recall.
21 Q. Do you know of anybody else that would have had
22 authority for MDI to hire and fire?
23 A. I do not.
24 Q. All right. I don't think I ever got your
25 personal address, Mr. Galvan. Could you give that to

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1 me, please?

2 A. 15251 Sparrow Road, Harlingen, Texas, 78552, is
3 our mailing address.

4 Q. Thank you. How long have you lived at that
5 address?

6 A. Since 2002.

7 Q. Okay. Is that the only address you've ever
8 lived at since you moved to the Rio Grande Valley?

9 A. In the Rio Grande Valley, yes. Oh, no. No,
10 no, it's not. Before that I lived at a house that I was
11 renting while I was working for Dell, and if you ask me
12 the address I couldn't tell you.

13 Q. That's fine. I understand. Do you remember
14 what street it was on?

15 A. No.

16 Q. Have you ever lived on a street called Villa
17 Verde in Brownsville, Texas?

18 A. No. I don't think.

19 Q. Okay. I think there's another Richard Galvan
20 in Cameron County, and that's why I wanted to kind of
21 clarify that we were talking about you and not somebody
22 else. Thank you. Okay. Mr. Galvan, other than your
23 businesses that you maintain in the Rio Grande Valley,
24 do you hold any positions with any civic or volunteer
25 groups in the Rio Grande Valley?

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1 A. No, I do not.

2 Q. Have you in the past?

3 A. I have.

4 Q. What positions have you held?

5 A. I was a board member for Harlingen Country
6 Club, I was a board member for Fellowship of Christian
7 Athletes, and I was a board member for the Economic
8 Development Corporation in Mercedes, Texas.

9 Q. Have you held any board positions for any
10 entities where you have to run for election, like a
11 school board or city council or anything like that?

12 A. No.

13 Q. Any neighborhood association boards?

14 A. Huh-uh. No.

15 Q. Okay. What church do you attend?

16 A. Livingway Family Church in Harlingen.

17 Q. And how long have you attended that church?

18 A. Since 2017 roughly.

19 Q. Okay. As a matter of background, what would
20 you consider your religious affiliation to be?

21 MS. NIX: Objection; form. You can answer.

22 THE WITNESS: Nondenominational.

23 Q. (BY MR. CHAPMAN) Okay. Did you grow up in a
24 particular denomination when you were younger?

25 A. No, not really.

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1 Q. Okay. How long have you been members -- at
2 Livingway you have been members since 2017?

3 A. That's correct.

4 Q. Where did you attend church prior to that?

5 A. Oh, we were at Church of the Living Word, went
6 to Valley International Christian Church and North Way
7 Bible Church, and attended some services at some other
8 churches like Lifeline, Pave the Way Ministries.

9 Q. One of those churches you just -- in your
10 answer was Church of the something, and you were going
11 too fast for me to write it down. What was that one
12 called?

13 A. Church of the Living Word.

14 Q. Okay. Thank you. With respect to the
15 Livingway Church, do you have any positions that you
16 volunteer and do at the Livingway Church?

17 MS. NIX: Objection; form.

18 THE WITNESS: No.

19 Q. (BY MR. CHAPMAN) Okay. Have you ever held
20 any positions with the Livingway Church?

21 MS. NIX: I believe it was Living Word as
22 opposed to Livingway.

23 MR. CHAPMAN: Oh, thank you. Thank you for
24 the clarification.

25 Q. (BY MR. CHAPMAN) Living -- is it Living Word

Page 45

1 or Livingway, Mr. Galvan?

2 A. Where I'm going -- where we're attending now?

3 Q. Yes.

4 A. It's Livingway.

5 Q. Livingway. Okay. With respect to Livingway
6 where you attend now, have you ever held any positions
7 within the church?

8 A. No.

9 Q. Have you ever taught Sunday school?

10 A. No.

11 Q. Have you led a youth group?

12 A. No.

13 Q. Okay. With respect to Church of the Living
14 Word, did you hold any positions within that church?

15 A. No.

16 Q. Did you teach Sunday school there?

17 A. No.

18 Q. Did you have any positions with the youth group
19 at that church?

20 A. No.

21 Q. Okay. With respect to Valley International
22 Church, did you hold any positions with that church?

23 A. No.

24 Q. Did you teach Sunday school or bible school or
25 anything like that there?

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1 A. No.

2 Q. Okay. With respect to North Way Bible Church,

3 did you hold any positions within that church?

4 A. No.

5 Q. Did you teach Sunday school at that church?

6 A. No.

7 Q. Did you maintain any volunteer positions with

8 that church?

9 A. We assisted with mission trips. We assisted

10 with vacation bible school and some other church

11 activities.

12 Q. Do you remember any of the other church

13 activities that you assisted with at North Way Bible

14 Church other than the youth group, mission trips and

15 bible school?

16 MS. NIX: Objection; form.

17 THE WITNESS: I said we assisted with

18 church mission trips, we assisted with vacation bible

19 school and other church activities.

20 Q. (BY MR. CHAPMAN) Okay. Were you ever an

21 elder, deacon, board member or anything of any similar

22 title with North Way Bible Church?

23 A. No.

24 Q. What years did you assist with the youth group

25 at North Way Bible Church?

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1 MS. NIX: Objection; form.

2 THE WITNESS: I assisted with church trips,

3 vacation bible school and other church activities.

4 Q. (BY MR. CHAPMAN) Did you assist with the

5 youth group?

6 A. Youth were involved in those activities.

7 Q. Okay. Did North Way Bible Church while you --

8 well, what years were you at North Way Bible Church?

9 A. Oh, from 2002 to -- off and on to about 2015 or

10 '16.

11 Q. Did North Way Bible Church have a formal youth

12 group?

13 A. Yes.

14 Q. Did you conduct meetings for that youth group?

15 A. We conducted mission trips that involved the

16 youth and also adults, and we would do these basically

17 from January to the summer in guidance with the

18 missionaries that were there at the church and the

19 pastors, Pastor Kelly.

20 MS. NIX: Objection; form.

21 Q. (BY MR. CHAPMAN) Could you give me Pastor

22 Kelly's full name?

23 A. Kelly Rumfield.

24 Q. Okay. Was Mr. -- or Pastor Kelly Rumfield, was

25 he the pastor the entire time you were at North Way

Page 48

1 Bible Church?

2 A. That's correct.

3 Q. Okay. Was there a youth pastor at North Way

4 Bible Church?

5 A. I don't believe there was.

6 Q. Were there any assistant pastors at North Way

7 Bible Church?

8 A. I don't believe anybody had that title.

9 Q. Okay. Did Mr. -- did the church have a church

10 secretary or any staff, to your knowledge?

11 A. I believe so, yes.

12 Q. With respect to vacation bible school

13 activities, while you were a member at North Way Bible

14 Church did you teach vacation bible school?

15 A. There was volunteer opportunities to assist

16 with snacks or arts and crafts or a skit. We would

17 volunteer, my wife and I and kids, to do certain things.

18 Q. Okay. Was that every year or just as needed

19 some of the time or how would you characterize it?

20 A. If we wanted to volunteer we would. That's

21 what we did. We would volunteer for things.

22 Q. With respect to Sunday school, did you teach

23 Sunday school at North Way Bible Church?

24 A. I don't believe there was a -- Oh, no. No, no,

25 no. There was a kids' thing, school on Sunday. But,

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1 no, I did not.

2 Q. Okay. If somebody was teaching Sunday school

3 there or something, what we would normally think of as

4 Sunday school, a kids' activity, you weren't teaching

5 that?

6 A. That's correct.

7 Q. Okay. How many mission trips did you go on

8 when you -- while you were involved or a member of North

9 Way Bible Church?

10 A. I went on four of them.

11 Q. Okay. Do you remember what years those

12 occurred in?

13 A. To the best of my recollection, it was in 2004,

14 2006, 2007 and 2008.

15 Q. 2008 being the last time you did that for North

16 Way Bible Church?

17 A. That's to the best of my recollection.

18 Q. Okay. With respect to that mission activity at

19 North Way Bible Church, who did you report to at the

20 church?

21 A. The pastor had full authority of the church.

22 Q. Was there a church board?

23 A. I don't know if there's a church board.

24 Q. Okay. You just reported to the pastor,

25 correct?

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1 A. I didn't report to anybody. I was just a
2 volunteer.

3 Q. Okay. For the mission trips you talked about
4 from '04 to '08, did you raise money out in the
5 community before you went on those trips?

6 A. Yeah, that was a big part of it was just
7 raising money.

8 Q. Give me an overview of how that would work on
9 any given year for the mission trips.

10 MS. NIX: Objection; form.

11 THE WITNESS: I don't recall a lot of that,
12 but it was brought about to where the cost for the trip
13 was the number one concern.

14 Q. (BY MR. CHAPMAN) So primarily you were trying
15 to raise money to take all the people down to wherever
16 you were going on your mission trip and you were trying
17 to raise funds in your community to pay for everybody's
18 way there and back; is that right?

19 A. Well, everybody was trying to raise funds, not
20 just myself.

21 Q. But the group did it. You did it as a group
22 though, correct? It wasn't just every man for himself?

23 A. Oh, no, they would go out and -- you know,
24 people would go out and raise funds themselves as well.

25 Q. Did you oversee group fundraising activities?

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1 A. I didn't. No, I was just there to assist with
2 the coordination of the trip.

3 Q. Okay. So you didn't oversee any group
4 activities to raise funds for these mission trips?

5 A. No, we had some -- no, huh-uh. No, we did not.

6 Q. Do you know of anybody that did that for the
7 church?

8 A. No.

9 Q. Any of the fundraising you did for the mission
10 trips for the church, did you keep the funds for, you
11 know, yourself in a bank account or did you give them to
12 the church to keep?

13 A. All funds went to the church.

14 Q. Okay. You would hand it over to Pastor
15 Rumfield then, I take it?

16 A. Whoever had raised funds would pass it over.

17 Q. Okay. You didn't take any salary or -- well,
18 you didn't take any salary or other compensation for
19 your activities with North Way Bible Church; is that
20 correct, sir?

21 A. We were volunteers.

22 Q. Okay. All right. Mr. Galvan, I have been
23 going about an hour and ten minutes. We'll take about a
24 five-minute break, let you stretch your legs, and we'll
25 come back. Okay?

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1 A. Thank you.

2 COURT REPORTER: We're off the record.
3 (Recess from 11:12 to 11:21.)

4 Q. (BY MR. CHAPMAN) Let's get back on the
5 record. Mr. Galvan, despite all our new precautions,
6 such as the wearing of masks, I have been able, I think,
7 to understand you thus far. Have you been able to
8 understand me?

9 A. Yes, sir.

10 Q. Okay. And you understand the questions that
11 I've asked you thus far, correct?

12 A. For the most part.

13 Q. Okay. With respect to what we've covered thus
14 far, is there anything that you've thought about during
15 the break that you think you need to add to or change or
16 anything like that?

17 A. Yeah, one of the things that you asked in
18 regards to some companies that I owned. I do remember
19 that I do have a joint venture with a company.

20 Q. Okay. I don't mean to interrupt you in a rude
21 manner. Let me get that in a question and answer format
22 for the transcript so it shows up better than just going
23 sort of willy-nilly there. You've identified a joint
24 venture that you're a part of. What is the name of
25 that?

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1 A. I believe it's called 59.03 Nexus.

2 Q. Could you say the first two words again, sir?

3 A. It's the numbers, 59.03, and then the second is
4 Nexus -- N-e-x-u-s -- LLC.

5 Q. Okay. Is that a Texas entity?

6 A. Yes, sir.

7 Q. You have a partner or partners in that entity?

8 A. I have a partner.

9 Q. Who is that?

10 A. Travis Bence.

11 Q. Okay. How long have y'all had that entity?

12 A. A couple of years, I believe. Two to three
13 years maybe. Maybe less. Maybe 18 months. I don't
14 know. I would say between 18 months and two years.

15 Q. Do you remember the month and year that you
16 formed 59.03 Nexus?

17 A. I do not, sir.

18 Q. Okay. Does that company have members or
19 officers or what?

20 A. It's owned by the members. I believe they're
21 members. I believe they're members. I do not
22 necessarily know if they're members or officers.

23 Q. Are there more members than just you and
24 Mr. Bence?

25 A. That's correct. Oh, no, no, no. No, there are

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1 not more members than just me and Mr. Bence.
 2 Q. Just you and Mr. Bence? What is 59.03
 3 Nexus's -- 53 -- excuse me. Strike that.
 4 What is -- what business is 59.03 Nexus in?
 5 A. It is in house restoration and leasing,
 6 property leasing.
 7 Q. Does 59.03 Nexus own real property?
 8 A. It owns -- I think it owns one or two houses.
 9 Q. Okay. And it is in the business of leasing
 10 those houses for rental income?
 11 A. That's correct.
 12 Q. Any commercial properties?
 13 A. No, sir.
 14 Q. Okay. Are you and Mr. Bence equal, have equal
 15 shares in that business?
 16 A. So the individuals or the entities involved
 17 with that are companies. One is MDI, LLC, and Mr. Bence
 18 has a company involved with that as well and I don't
 19 recall the name.
 20 Q. Okay. But you and Mr. Bence are in this joint
 21 venture through LLCs that you each own?
 22 A. That's correct.
 23 Q. Are those LLCs -- inside 59.03 Nexus do those
 24 LLCs own equal shares of that business?
 25 A. Yes.

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1 Q. Does one of you or Mr. Bence take the lead role
 2 in running the operations?
 3 A. No.
 4 Q. You do everything together?
 5 A. Yes.
 6 Q. And forgive me. I delayed note taking on my
 7 part when you were talking. What year and month did you
 8 say you started that business?
 9 A. Again, I don't recall exactly.
 10 Q. Was it in 2000-- I'm sorry. I didn't mean to
 11 interrupt. Go ahead.
 12 A. Go ahead. Ask your question.
 13 Q. Was it in 2018 that it started?
 14 A. Could be. Honestly, I do not know. I don't
 15 know.
 16 Q. Okay. You don't know if it started in '18 or
 17 2019?
 18 A. I think it started in 2017.
 19 Q. Okay. Very good. I appreciate that.
 20 Mr. Galvan, are there any other joint ventures, business
 21 interests, investments? I'm not talking about a stock
 22 portfolio or anything like that you have, but something
 23 where you actively participate in a business like you
 24 just identified. Is there anything else that you've
 25 thought about that's like this 59.03 Nexus where you

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1 have an ongoing business interest?
 2 A. No.
 3 Q. Okay. All right. Let's switch gears here a
 4 little bit. I asked you at the very first of this
 5 deposition if you'd given deposition testimony before
 6 and you indicated that you have. Do you remember what
 7 case that was in?
 8 A. It was a workman's comp case, and it was -- I
 9 don't recall the exact name of the case.
 10 Q. Was that related to one of your business
 11 entities?
 12 A. Yes.
 13 Q. Do you remember which one?
 14 A. Orbit Broadband. Can you -- I believe it was
 15 one of the discovery answers. Can you refresh my --
 16 Q. Sure. I will be happy to if I can do that.
 17 Give me one second. You're referring to a case where
 18 the party was Rubiela Lopez for the Estate of Pedro
 19 Salazar via Orbit Broadband?
 20 A. That's correct.
 21 Q. Had Mr. Salazar been an employee of Orbit
 22 Broadband?
 23 A. Yes.
 24 Q. Did he pass away in some fashion while he was
 25 working for Orbit Broadband?

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1 A. He did.
 2 Q. What happened, just in general terms?
 3 A. I don't know if I can answer that with the
 4 settlement. I mean --
 5 MS. NIX: Objection; form. In the event
 6 that there's some confidentiality, Mr. Chapman, I'm not
 7 sure what the --
 8 Q. (BY MR. CHAPMAN) I understand. I'm not asking
 9 for any terms of the settlement. I just want to talk
 10 about the type of lawsuit that it was. Was it a
 11 wrongful death case?
 12 A. It was -- it dealt with workman's compensation.
 13 Q. Okay. Was there an allegation that Mr. Salazar
 14 had died while doing something on behalf of Orbit
 15 Broadband?
 16 A. Yes, I believe so. I'm not an attorney, so I
 17 don't remember.
 18 Q. Sure. And I'm not -- I'm not trying to get you
 19 in trouble with any settlement agreement you may have
 20 reached. Let me ask you. Just yes or no on the record.
 21 Was there a settlement reached in that case?
 22 A. Yes, there was.
 23 Q. And there is some settlement agreement in that
 24 case that you believe binds you to certain
 25 confidentiality going forward?

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1 MS. NIX: Objection; form.
 2 THE WITNESS: I believe so.
 3 Q. (BY MR. CHAPMAN) Okay. With respect to --
 4 let's start with Orbit Broadband. With respect to Orbit
 5 Broadband, has it been a party to any other civil
 6 lawsuits?
 7 A. Not that I can recall.
 8 Q. Okay. I'm going to lump these together, and if
 9 I need to break them apart I'm happy to do so. The
 10 other business entities you identify that you own,
 11 either solely or with your wife, are MDI, G5 Internet
 12 Services and G5 Streaming. Do you understand the
 13 entities I'm talking about?
 14 A. Yes.
 15 Q. Have those entities been a party to any civil
 16 lawsuits that you recall?
 17 A. There was a -- and I'm not sure if this is
 18 civil or not. But we did have an employee get in an
 19 accident and that employee was then being sued or we
 20 were. I'm not sure if that's civil. I don't know.
 21 Q. It sounds like it is, and I understand you may
 22 not have a -- you know, detailed memory of this. Do you
 23 remember which entity that involved?
 24 A. I think it was Orbit Broadband.
 25 Q. Okay. Was the time in the Salazar case the

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1 only other time that you've given deposition testimony?
 2 A. Yes.
 3 Q. And you've only been married one time, correct?
 4 A. That's correct.
 5 Q. So sometimes people don't think about family
 6 law issues as lawsuits. But just to clear that up, you
 7 haven't been involved in any divorce proceedings or any
 8 suits affecting parent/child relations; is that fair?
 9 A. Yes, that's correct. I have not.
 10 Q. Thank you for doing that because I was about to
 11 have to correct my bad question and ask if yes was no.
 12 But you have not been involved in any of those suits,
 13 correct?
 14 A. I have not.
 15 Q. Thank you. Have you been a party to any
 16 criminal suits where you have been prosecuted for a
 17 crime in the last ten years?
 18 MS. NIX: Objection; form. Answer.
 19 THE WITNESS: No.
 20 Q. (BY MR. CHAPMAN) Okay. All right. Let's
 21 talk -- let's talk about the lawsuit that we are here on
 22 today, and the court reporter read that out as
 23 2018-DCL-06387. You understand what lawsuit I'm talking
 24 about certainly, correct?
 25 A. Yes.

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1 Q. And this is a lawsuit filed by you and your
 2 wife, Sonia Galvan, correct?
 3 A. Yes.
 4 Q. And the defendants to that lawsuit are my
 5 clients, Blaine and Hannah Crews, correct?
 6 A. Yes.
 7 Q. Okay. Have you as an individual ever sued
 8 anybody else in a civil court before this case?
 9 A. Not to my recollection, no.
 10 Q. To your knowledge, has your wife been a party
 11 to any civil matter as an individual?
 12 A. No.
 13 Q. Okay. And this lawsuit was filed on or about
 14 November 5th, 2018. Does that sound right to you?
 15 A. I believe so, yes.
 16 Q. Okay. I'm going to attempt to use technology
 17 here for a minute. We'll see how this works.
 18 Ms. Rimmer, I'm going to attach a copy of the petition
 19 in this case and talk about that for a little bit.
 20 Let's see here. Okay. My view just changed. Can you
 21 see a petition with Certified Copy at the top and it
 22 says Temporary Restraining Order on the first --
 23 A. Yes.
 24 Q. Okay. Excellent. I watched this in a
 25 deposition yesterday but somebody else was doing it to

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1 me, so this is my first time to do this, do this with me
 2 being the person sharing the document. If you have any
 3 problems viewing it or it fades or whatever, let me know
 4 in the midst of questions about this and I'll see what I
 5 can do because I certainly don't hold myself out to be a
 6 Zoom whiz as of yet.
 7 This is the original document that you
 8 filed in the 445th District Court of Cameron County,
 9 Texas to start this lawsuit, is it not, sir?
 10 MS. NIX: Objection; form.
 11 THE WITNESS: I don't know if that is what
 12 we did to start the lawsuit.
 13 Q. (BY MR. CHAPMAN) Okay. Let's -- let's talk
 14 about how this lawsuit came to be then for a minute. If
 15 this lawsuit was filed on November 5th, 2018, when did
 16 the events -- well, strike that.
 17 Did the events that the lawsuit makes
 18 actionable also occur sometime in 2018?
 19 A. I don't understand your question.
 20 Q. Okay. Let me rephrase. That might have been
 21 awkwardly worded. I apologize. This lawsuit is about
 22 some phone calls and some communications that occurred
 23 in 2018, correct?
 24 MS. NIX: Objection; form.
 25 THE WITNESS: That's -- that's correct.

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1 Q. (BY MR. CHAPMAN) Okay. And in this lawsuit
 2 you sued my clients, Blaine and Hannah Crews. I'll skip
 3 down here. That's a restraining order. Hold on a
 4 second. In this lawsuit you obtained a temporary
 5 restraining order against my clients, Blaine and Hannah
 6 Crews, correct?
 7 A. I believe so, yes.
 8 Q. Okay. Explain to me what the lawsuit was about
 9 in your own words.
 10 A. Blaine Crews had been messaging my wife Sonia
 11 in regards to allegations of me seducing and
 12 manipulating Hannah Crews. We had sent a Facebook
 13 Messenger to her and texted her and, I believe, called
 14 as well, and only her. He never called me. He never
 15 Facebooked me. He never texted me. And so after a
 16 number of times I picked up the phone and I called him
 17 and I asked him, and he answered the call and
 18 immediately started accusing me of seducing and
 19 manipulating Hannah Crews, cursing, yelling, and wanted
 20 to know and wanted Sonia on the phone to hear what he
 21 had to say. So then Sonia and I were at the movies when
 22 this happened. It was just us two. Our kids were at
 23 home. When I -- Sonia had gotten out of the movie also
 24 after me, and we proceeded -- he started accusing me of
 25 these allegations, and he stated that he was a person of

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1 importance and that this would not be the end of it
 2 until our children would be affected.
 3 Q. Okay. And this -- did you have one call where
 4 you and Sonia were on the phone with Blaine Crews or was
 5 there more than one?
 6 A. Just one.
 7 Q. Okay. Do you remember what date that occurred
 8 on?
 9 A. Oh, it was in October of 2018.
 10 Q. Shortly before you filed the lawsuit, correct?
 11 A. That's correct.
 12 Q. Did Mr. Crews send you any other communications
 13 on this same subject manner?
 14 A. Never.
 15 Q. But he did, you believe, send some messages to
 16 your wife?
 17 A. Oh, he did.
 18 Q. Okay. After the phone call that you described
 19 just a minute ago did you get any more messages -- did
 20 your wife get any more messages or communications from
 21 Mr. Crews?
 22 A. I don't believe so.
 23 Q. Okay. What did you do with respect to
 24 Mr. Crews's actions after that phone call you just
 25 described?

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1 A. We went home. I went home immediately. He
 2 threatened our kids. He said that he wasn't going to
 3 stop until they were affected. And we left, went home
 4 to make sure our kids were okay. We called them and
 5 they answered the phone immediately.
 6 Q. Do you remember exactly what you think
 7 Mr. Crews said about your children?
 8 A. What he did say is that he would not stop until
 9 they were affected, that he would not stop.
 10 Q. When he -- when you say the phrase not stop,
 11 did you know at the time what he meant by that?
 12 A. I believe that he was going to hurt them.
 13 Q. Did he say that in the phone call?
 14 A. I just said that he said that he would not stop
 15 until they were affected.
 16 Q. Did he say he was going to hurt your children?
 17 A. His tone and his words were threatening and
 18 that he would not stop until they were affected.
 19 Q. Did Mr. Crews tell you on the phone call that
 20 he was going to hurt your children?
 21 A. Affected means changing a state, altering a
 22 current existence, and that's what he --
 23 Q. Objection -- objection; nonresponsive.
 24 I need an answer to this question,
 25 Mr. Galvan. Did Mr. Crews tell you on the phone call in

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1 2018 that he was going to hurt your children?
 2 A. No, he did not tell me specifically he was
 3 going to hurt my children.
 4 Q. Did he tell you he was going to hurt your wife?
 5 A. No, he did not.
 6 Q. Did he tell you he was going to hurt you?
 7 A. He said that if he would have known certain
 8 things at the time that he would have put a bullet in my
 9 head. But, no, he did not threaten -- tell me he was
 10 going to hurt me.
 11 Q. And he didn't threaten with respect to you any
 12 imminent physical harm, correct?
 13 A. Correct.
 14 Q. And he didn't threaten any imminent physical
 15 harm to your wife, correct?
 16 A. Correct.
 17 Q. And he didn't threaten any imminent physical
 18 harm to your children, correct? Is that correct, sir?
 19 A. Correct.
 20 Q. At some point after this phone call I would
 21 presume that you talked to a lawyer; is that fair?
 22 A. Yes.
 23 Q. How long after the phone call was that?
 24 A. It was pretty immediate.
 25 Q. The next day?

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1 A. I would say the next day.
 2 Q. Okay. I don't want to know anything about what
 3 you said to your lawyer, if you eventually hired a
 4 lawyer, but who did -- what lawyer did you go to?
 5 A. Travis Bence.
 6 Q. Did you call around for any other lawyers or
 7 did you just go to Mr. Bence?
 8 MS. NIX: Objection; form.
 9 THE WITNESS: I just talked to Mr. Bence.
 10 Q. (BY MR. CHAPMAN) And at this point was he
 11 already your partner in 59.03 Nexus through your
 12 respective LLC entities?
 13 A. Yes.
 14 Q. Do you recall how long it was after your first
 15 contact with Mr. Bence that Mr. Bence filed a lawsuit on
 16 your behalf that we are here on today?
 17 A. Within two weeks.
 18 Q. With respect -- before you talked to Mr. Bence,
 19 with respect to your actions did you do anything else to
 20 research Blaine Crews or Hannah Crews in preparation --
 21 MS. NIX: Objection; form.
 22 Q. (BY MR. CHAPMAN) -- in preparation for the
 23 meeting with Mr. Bence?
 24 MS. NIX: Objection; form.
 25 THE WITNESS: No.

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1 Q. (BY MR. CHAPMAN) Okay. Did you review any
 2 additional communications by Mr. Crews other than -- let
 3 me strike that. Let me ask you this first. Did you go
 4 back and look at the -- look at what Mr. Crews had sent
 5 to your wife in terms of messages and communications?
 6 A. Can you repeat the question? You buffered.
 7 Q. Yeah, I'm sorry. You had this phone call with
 8 Mr. Crews and you testified that he had sent your wife
 9 some communications. Did she let you review those from
 10 her phone?
 11 A. Yes.
 12 Q. And did y'all save those in some fashion?
 13 A. No.
 14 Q. Okay. Were there any emails or anything other
 15 than instant messages that you looked at?
 16 A. No.
 17 Q. Did you look at any messages or communications
 18 that Mr. Crews had with anybody else on the subject
 19 matter of your call?
 20 A. No.
 21 Q. Have you to this day?
 22 MS. NIX: Objection; form.
 23 THE WITNESS: Have I to this day looked at
 24 anything that Mr. Crews had with somebody?
 25 Q. (BY MR. CHAPMAN) Yeah. And let me -- let

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1 me -- I'll strike that. I might have asked that in a
 2 way that it seems more broad than it is, than I was
 3 intending.
 4 Mr. Crews communicated -- made some, you
 5 know, communications via instant message with your wife.
 6 Now, prior to filing this lawsuit did you review any
 7 other communications made by Mr. Crews about you and
 8 your wife?
 9 A. No.
 10 Q. Okay. So you didn't review any communications
 11 he might have made to a church or to a school prior to
 12 you filing this lawsuit; is that correct?
 13 A. That's correct.
 14 Q. Okay. Now, in your testimony about this and
 15 certainly in your petition you used the phrase
 16 manipulation and seduction or seduction and
 17 manipulation. You understand that phrase that you
 18 testified about, correct? You've used it?
 19 A. That is what Blaine has alleged.
 20 Q. Okay. Were those the words that Mr. Crews used
 21 on your phone call?
 22 A. To the best of my recollection, yes.
 23 Q. Mr. Crews said the words manipulation and
 24 seduction to you on the phone call when you and your
 25 wife were on the phone with him?

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1 A. Yes.
 2 Q. Do you know -- well, strike that.
 3 With respect to this phone call before the
 4 lawsuit, do you know -- strike that again. I apologize.
 5 With respect to this phone call that
 6 occurred in October before you filed suit, did you know
 7 at the time whether or not Hannah Crews was also on that
 8 call?
 9 A. I'm sorry. Can you repeat the question?
 10 Q. Yeah. You testified about the time that Blaine
 11 called you and your wife and y'all were at the movies.
 12 Do you remember that testimony?
 13 A. Uh-huh.
 14 Q. Did you know at the time whether or not Hannah
 15 Crews might also be on that call?
 16 A. We had asked. Sonia had asked where Hannah
 17 was, and Blaine said, She's right here with me.
 18 Q. Were y'all on a speakerphone so y'all could
 19 both hear?
 20 A. That's correct.
 21 Q. And were you in the movies or were you in your
 22 car or where did you go to take this call?
 23 A. We were outside the movies in the hallway.
 24 Q. Okay. Do you recall how long the call lasted?
 25 A. No.

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1 Q. Was it more than half an hour?
 2 A. I don't recall.
 3 Q. Was this before you saw a movie or after you
 4 got done?
 5 A. It was during.
 6 Q. Did you leave a movie to go take this call?
 7 A. Yes.
 8 Q. Okay. Do you remember the movie, the name of
 9 the movie?
 10 MS. NIX: Objection; form.
 11 THE WITNESS: No.
 12 Q. (BY MR. CHAPMAN) Was the call longer than an
 13 hour?
 14 A. I don't recall. It was -- I don't recall. I
 15 don't.
 16 Q. Was it less than ten minutes?
 17 A. I still don't recall the exact amount of time.
 18 Q. Okay. Did Mr. Crews call -- well, let me ask
 19 it this way. Who initiated this call that you had at
 20 the movies?
 21 A. I called him.
 22 Q. You called Mr. Crews?
 23 A. That's right.
 24 Q. Okay. Did you call him from your phone or from
 25 your wife's phone?

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1 A. My phone.
 2 Q. Okay. And you called him in response to
 3 messages that your wife received on her phone, correct?
 4 A. Correct.
 5 Q. Is that correct?
 6 A. Yes, it is.
 7 Q. All right. Thank you. And then like I think
 8 you testified that the next day you were at a lawyer --
 9 you were talking with Mr. Bence about a potential
 10 lawsuit, correct?
 11 A. No, I was talking to him about the actual phone
 12 call.
 13 Q. Okay. And that consultation continued, and by
 14 November 5th of 2018 -- actually, let me pull something
 15 else up. I had a document that I thought was inclusive
 16 of the petition. Let me correct something. I'm going
 17 to share a different document.
 18 MS. NIX: And I object as to form,
 19 Mr. Chapman, on consultation.
 20 MR. CHAPMAN: Okay. Ms. Reporter, this
 21 will be Exhibit 2. It's the original petition and
 22 application for injunctive relief.
 23 Q. (BY MR. CHAPMAN) Can you see that document,
 24 Mr. Galvan?
 25 A. Yes.

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1 Q. That's the lawsuit that was ultimately filed
 2 relating to this phone call that you had with Mr. Crews,
 3 correct?
 4 A. Yes.
 5 Q. And that was filed by Mr. Bence, correct?
 6 A. That's correct.
 7 Q. And you had retained him as your lawyer by that
 8 point, correct?
 9 A. That's correct.
 10 Q. Did you have a written fee agreement with
 11 Mr. Bence?
 12 MS. NIX: Objection; form. Answer.
 13 THE WITNESS: No.
 14 Q. (BY MR. CHAPMAN) Did you pay Mr. Bence money
 15 before he filed this lawsuit for you?
 16 MS. NIX: Objection; form.
 17 THE WITNESS: No.
 18 Q. (BY MR. CHAPMAN) Can you read the title of
 19 that document for me, sir? This will be Exhibit 2.
 20 A. Plaintiff's Original Petition and Application
 21 for Injunctive Relief.
 22 Q. You reviewed this document before it was filed
 23 with the court, correct?
 24 A. That's correct.
 25 Q. Let's go forward here. All right. Now I have

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1 turned -- scrolled down in this document, this original
 2 petition, to a section that says Facts at the top of the
 3 window. Do you see that?
 4 A. Uh-huh. Yes, I do.
 5 Q. Okay. And the first sentence there reads, On
 6 or about October 20th, 2018, Plaintiff Sonia Galvan at
 7 9:16 p.m. received a Facebook message from Defendant
 8 Blaine Crews. Do you see that?
 9 A. Yes.
 10 Q. Does that refresh your recollection as to what
 11 day the messages and the call or at least the messages
 12 to your wife Sonia occurred?
 13 A. Yes.
 14 Q. And that occurred on October 20th, 2018,
 15 correct?
 16 A. That's correct.
 17 Q. And then you say in those messages he sought
 18 her cell phone number and demanded to speak with both
 19 you and your wife Sonia; is that correct?
 20 A. I'm sorry. You said that he sought her cell
 21 phone number?
 22 Q. Yeah, that's the next part of this. It says,
 23 Blaine Crews sought Sonia Galvan's cell phone number and
 24 demanded to speak with plaintiffs. And I assume that
 25 means you and your wife; is that correct?

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1 A. That's correct.
 2 Q. Okay. You weren't a party to these messages on
 3 October 20th, were you?
 4 A. No, I was not.
 5 Q. Okay. Then on October 21st -- in the next
 6 sentence this petition reads, October 21st, 2018, at
 7 6:38 p.m. Defendant Blaine Crews called Sonia Galvan's
 8 cell phone but Plaintiff did not answer. Do you see
 9 that?
 10 A. Yes.
 11 Q. Is that statement true and correct?
 12 A. Yes.
 13 Q. Immediately thereafter in the next sentence,
 14 Defendant Blaine Crews texted Sonia Galvan and claimed
 15 that Plaintiff Richard Galvan seduced and manipulated
 16 Defendant Hannah Crews in 2007. Do you see that
 17 sentence?
 18 A. I do.
 19 Q. Is that sentence true and correct?
 20 A. Yes, it is.
 21 Q. Did you see the text that Mr. Crews sent to
 22 your wife Sonia?
 23 A. I did.
 24 Q. Did it use the words seduced and manipulated?
 25 A. Yes.

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1 Q. Do you still have that text?
 2 A. I do not.
 3 Q. Do you know if your wife does?
 4 A. I don't know, but, no, she doesn't.
 5 Q. So that's she doesn't?
 6 A. That's correct.
 7 Q. Then at that point we get to the phone call we
 8 have been talking about. On October 21st, 2018, at 7:01
 9 p.m. Plaintiff Richard Galvan called Defendant Blaine
 10 Crews. Do you see that sentence?
 11 A. I do.
 12 Q. That's the phone call you're talking about
 13 where you left a movie and you went and sat outside the
 14 movies and you talked to Mr. Crews, correct?
 15 A. That's correct.
 16 Q. And that's the only phone call that you had
 17 with Mr. Crews about this matter, correct?
 18 A. That is correct, yes.
 19 Q. Okay. And in this phone call it's your
 20 testimony that Mr. Blaine Crews claimed in 2007 that
 21 you, Mr. Galvan, manipulated and seduced Defendant
 22 Hannah Crews, correct?
 23 A. Yes.
 24 Q. And he used the language manipulated and
 25 seduced per your prior testimony, correct?

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1 A. That's correct.
 2 Q. You wouldn't do anything to change that
 3 sentence now, correct?
 4 A. No.
 5 Q. Okay. And your testimony is that Mr. Crews
 6 spoke in threatening tones and numerous curse words. Do
 7 you see that sentence there?
 8 A. Yes.
 9 Q. Okay. Just briefly, what do you mean by
 10 threatening tones, sir?
 11 A. When somebody -- well, he called me curse words
 12 and elevated his voice and was yelling and if you or if
 13 I would have known, you know, those types of things.
 14 Q. Okay. The next sentence, the last sentence in
 15 that paragraph, reads, Defendant Blaine Crews then
 16 explained he would have put a bullet in Plaintiff
 17 Richard Galvan's head if Defendant Blaine Crews knew
 18 Defendant Hannah Crews in 2007. Do you see that
 19 sentence?
 20 A. I do.
 21 Q. Is that a correct statement of what Mr. Crews
 22 said on your phone call?
 23 A. Yes, it is.
 24 Q. Mr. Crews was angry in this call. Would that
 25 be your opinion?

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1 A. That would be my opinion.
 2 Q. When you were having this call, did you
 3 understand what Mr. Crews was angry about?
 4 A. He had predicated it with a text message, I
 5 believe, to my wife, so yes.
 6 Q. What was Mr. Crews angry about?
 7 A. That he alleged that I sexually -- that I
 8 seduced and manipulated Hannah in 2007.
 9 Q. And you understood what this call was about
 10 when you took it in 2018, correct?
 11 A. I called him to tell him to stop threatening my
 12 wife. That's what I did.
 13 Q. In 2007 you did in fact have sex with Hannah
 14 Crews, correct?
 15 A. Yes.
 16 Q. And you understood during this phone call that
 17 that was the subject of what Mr. Crews was calling you
 18 about?
 19 A. I understood that Mr. Crews was very angry. He
 20 was threatening, cursed me out.
 21 Q. You understood at the time of this phone call
 22 that Mr. Crews was married to Hannah Crews, correct?
 23 A. That's correct.
 24 Q. And Hannah Crews for purposes from here on out,
 25 in 2007 she's known as Hannah Linn, correct?

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1 A. Correct.

2 Q. Okay. And if I say Hannah in this deposition,

3 you know who we're talking about, correct?

4 A. I do, yes.

5 Q. Okay. So you understood at the time of the

6 phone call in 2018 that Mr. Crews was mad about the fact

7 that you had had sex with his wife? And let me preface

8 that by saying even though she wasn't his wife at the

9 time and she was known as Hannah Linn. But you

10 understood that was the subject of the phone call?

11 A. Yes.

12 Q. How old was Hannah Linn when you had sex with

13 her in 2017 [sic]?

14 A. '17.

15 Q. Where did she go to church?

16 A. North Way Bible Church.

17 Q. How long had you known her at that time?

18 A. I don't know exactly.

19 Q. More than a month?

20 A. Yes.

21 Q. More than a year?

22 A. More than a year.

23 Q. Okay. Did you know her family?

24 A. Yes.

25 Q. Did you know her parents?

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1 A. Yes.

2 Q. Who are her parents?

3 A. Richard and Starla Linn.

4 Q. Were you friends with her parents?

5 A. Yes, we were friends.

6 Q. Okay. Let's get back to this petition. I'm

7 going to scroll down a little bit. There is a sentence

8 that reads, Crews demanded that Plaintiff Richard Galvan

9 should not ever talk about anything of faith, go

10 anywhere of faith and will find out what Defendant is

11 going to do to him. Do you remember with respect to

12 that sentence what Mr. Crews said exactly in your phone

13 call?

14 A. He said exactly that.

15 Q. Okay. That's as word for word as you can get

16 it; is that right?

17 A. That's the best of my recollection.

18 Q. Okay. You didn't record that phone call, did

19 you?

20 A. No, I did not.

21 Q. Did you make any notes of it right at the time

22 that it happened, any written notes?

23 A. No.

24 Q. Okay. The next sentence reads, The following

25 day Plaintiffs contacted Plaintiffs' church and advised

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1 them that the church would be receiving a similar

2 threatening call. Do you see that sentence?

3 A. I do.

4 Q. Is that sentence true and correct?

5 A. Yes.

6 Q. Who contacted the church?

7 A. I did.

8 Q. Who did you call?

9 A. I called Pastor Bill Moore.

10 Q. And did you speak directly with him?

11 A. I did.

12 Q. What did you say to Mr. Moore, to the best of

13 your recollection?

14 A. That we received a very disturbing call and

15 that in the call that our children were threatened and

16 that those threats were not going to stop, and so I had

17 told him that if he received or saw anything to be on

18 the -- be on the lookout.

19 Q. Did you tell him who would be calling?

20 A. Yes, I did.

21 Q. Who did you identify as the person that would

22 be calling?

23 A. Blaine Crews.

24 Q. Did you identify Hannah Crews to Pastor Moore?

25 A. No, I did not.

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1 Q. Did you tell Mr. Moore, Pastor Moore, that you

2 had had sex with Hannah Crews when she was 17?

3 A. No, I did not.

4 Q. Did you tell Pastor Moore the subject of the

5 call that you had had with Mr. Crews?

6 A. No, I did not.

7 Q. Did you use the words manipulation and

8 seduction in your conversation with Pastor Moore?

9 A. No.

10 Q. After you advised Pastor Moore of the threats

11 that might be made to the church, in your opinion, what

12 did Pastor Moore say to you?

13 MS. NIX: Objection; form.

14 THE WITNESS: Threats to my children is

15 what it was. He would tell me that -- he told me that

16 he would let me know if he had heard anything.

17 Q. (BY MR. CHAPMAN) Did Pastor Moore ever

18 contact you back and say that he had heard something?

19 MS. NIX: Objection; form.

20 MR. CHAPMAN: What's the basis for that

21 objection?

22 MS. NIX: Hearsay.

23 MR. CHAPMAN: Can you read back the

24 question, Madam Reporter?

25 COURT REPORTER: Did Pastor Moore ever

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1 contact you back and say that he had heard something?
 2 Q. (BY MR. CHAPMAN) You can answer the question,
 3 Mr. Galvan.
 4 A. Yes, he did.
 5 Q. Okay. Your first call to Pastor Moore where
 6 you advised him of what you perceived to be a threat,
 7 how long did that phone call last?
 8 A. Maybe a few minutes.
 9 Q. And that was on October 22th, 2018, correct?
 10 A. I believe so.
 11 Q. Did Pastor Moore contact you back the same day?
 12 A. No.
 13 Q. How long was it before Pastor Moore contacted
 14 you back?
 15 A. A few days later.
 16 Q. Do you have an estimate as to what date that
 17 would have been on?
 18 A. October 25th.
 19 Q. And the next sentence of this petition that's
 20 Exhibit 2 reads, On October 25th, 2018, at 11:10 a.m.
 21 Plaintiffs learned that Defendant Blaine Crews contacted
 22 the church the previous day and again claimed
 23 manipulation and seduction of Defendant Hannah Crews by
 24 Plaintiff Richard Galvan and Plaintiff Sonia Galvan knew
 25 about it. Do you see that sentence?

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1 A. Yes.
 2 Q. Does that date and time reflect a call that you
 3 received back from Pastor Moore?
 4 A. What we received is we received a -- I think it
 5 was a text message or a call -- I forgot -- from Pastor
 6 Moore saying that Blaine Crews had called the church and
 7 had told the church alleging manipulation and seduction
 8 of Hannah. That's what we were told.
 9 Q. Okay. Was that told to you directly by Pastor
 10 Moore?
 11 MS. NIX: Objection; form, and a running
 12 objection to Pastor Moore's statements.
 13 THE WITNESS: Yes.
 14 Q. (BY MR. CHAPMAN) And was it told to you via a
 15 text or via a phone call?
 16 A. I don't recall.
 17 Q. Do you have any texts from that time period
 18 from Pastor Moore that you have saved?
 19 A. No.
 20 Q. Did anybody else from the church contact you on
 21 this subject?
 22 A. No.
 23 Q. Do you know if Mr. Crews made any additional
 24 contacts with the church?
 25 A. I believe so.

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1 Q. Do you know when those were made?
 2 A. I'm not exactly sure.
 3 Q. Have you kept any records that would reflect
 4 when those additional contacts with the church were made
 5 by Mr. Crews, to your information and belief?
 6 A. No.
 7 Q. Did your wife -- Mr. Galvan, did your wife
 8 Sonia have any of these contacts with the church as well
 9 as yourself or was it just you?
 10 A. It was just me.
 11 Q. Was anybody else, to your knowledge -- strike
 12 that.
 13 To your knowledge, was anybody else from
 14 the church on the phone call that you had with Pastor
 15 Moore?
 16 A. No.
 17 Q. All right. I want to go down a sentence here.
 18 Because of the threats made, on October 26, 2018,
 19 Plaintiff contacted children's school and -- Plaintiffs
 20 contacted children's school and warned them of the
 21 likely campaign of defaming communications coming from
 22 Defendant Blaine Crews. Do you see that sentence?
 23 A. I do.
 24 Q. In your opinion as we sit here today, is that
 25 sentence true and correct?

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1 A. Yes. Yeah.
 2 Q. Is that a yes, sir?
 3 A. Yes.
 4 Q. There is a phrase in there, two words, defaming
 5 communications. Do you see that?
 6 A. I do.
 7 Q. At the time that this petition was filed, what
 8 was your understanding of that phrase in your own words?
 9 A. Seduction and manipulation.
 10 Q. Your testimony is that the words seduction and
 11 manipulation were defaming communications; is that
 12 correct?
 13 A. Yes.
 14 Q. What does the phrase defaming communications
 15 mean?
 16 A. In what aspect? I'm not sure.
 17 Q. What does it mean to you?
 18 A. Okay. You kind of asked the question, so if
 19 you would give me a little bit clearer.
 20 Q. Sure. Let's start with the first word.
 21 Defaming.
 22 A. Uh-huh.
 23 Q. What does that mean to you?
 24 A. It means like bad stuff, things that are
 25 untrue.

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1 Q. And you understood that to have the same
 2 meaning at the time that you filed this petition in
 3 2018?
 4 A. That's correct.
 5 Q. What was untrue about the communications from
 6 Defendant Blaine Crews?
 7 A. That I seduced Hannah and manipulated her.
 8 Q. So when you filed this petition in 2018 you're
 9 stating that the defaming communications were, A, that
 10 you seduced Hannah, correct?
 11 A. Correct.
 12 Q. And your position was at the time that you did
 13 not seduce Hannah, correct?
 14 A. Correct.
 15 Q. Is that still your position today?
 16 A. Yes.
 17 Q. What does seduce mean to you?
 18 A. It means to -- to seduce. It means that you
 19 would or somebody would try to entice somebody to do
 20 something that would be incorrect or over another better
 21 judgment.
 22 Q. When you say incorrect in this context, you're
 23 referring about something romantic or sexual, correct?
 24 A. That's correct.
 25 Q. So you have defined seduce as doing something

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1 to entice the person into something romantic or sexual,
 2 correct?
 3 A. Yes, that's correct.
 4 Q. At this time in 2018 when you were having these
 5 conversations and then filing this lawsuit, you hadn't
 6 forgotten that you had sex with Hannah Crews in 2007,
 7 had you?
 8 A. No.
 9 Q. So your claim with regards to the defamation or
 10 defaming communications in this sentence is that you had
 11 sex with her but you didn't seduce her; is that correct?
 12 MS. NIX: Objection; form.
 13 THE WITNESS: The claim is that -- is the
 14 allegations of seduction and manipulation.
 15 Q. (BY MR. CHAPMAN) Right now we're just talking
 16 about seduction. We'll handle manipulation in a minute.
 17 So to be clear, with respect to seduction, you said a
 18 minute ago in your testimony that that was false. Do
 19 you remember that testimony?
 20 A. That's correct.
 21 Q. And then you defined seduction as enticing
 22 someone into something romantic or sexual. Do you
 23 remember that testimony?
 24 A. I do.
 25 Q. And in 2007 you did in fact have sexual

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1 intercourse with Hannah Crews; is that correct?
 2 A. That is correct.
 3 Q. Is it your position in this lawsuit when you
 4 filed it that you had had sex with Hannah Crews in 2007
 5 but that act did not rise to the level of seduction?
 6 A. That's correct. I did not seduce.
 7 Q. So you weren't denying -- when you said
 8 seduction was false, you're not denying romantic or
 9 sexual. You are simply saying that you didn't entice
 10 her into that?
 11 A. That's correct.
 12 Q. Where did your sexual encounter with Hannah
 13 Crews occur in 2007?
 14 A. At the La Quinta Hotel in Mercedes, Texas.
 15 Q. So was it in a -- so it was in a hotel room?
 16 A. That's correct.
 17 Q. Had that hotel room been rented for one day?
 18 A. That's correct.
 19 Q. Who rented that hotel room?
 20 A. I did.
 21 Q. Did you rent that hotel room specifically to
 22 have sex with Hannah Crews, Hannah Linn at that time?
 23 A. Yes.
 24 Q. How long were you in that hotel room?
 25 A. I don't recall exactly, but probably maybe

Page 89

1 20 minutes or less. I don't know.
 2 Q. You didn't spend the night there?
 3 A. No.
 4 Q. Did you go to the hotel by yourself?
 5 A. I did, yes.
 6 Q. Did you then invite Hannah Crews to meet you at
 7 the hotel room?
 8 A. No, not then.
 9 Q. Had you previously invited Hannah Crews to meet
 10 you at the hotel room?
 11 A. That's where we agreed to meet.
 12 Q. Did you contact her once you obtained the room?
 13 A. She showed up.
 14 Q. Did you invite her? Did you contact her once
 15 you obtained the room?
 16 A. She showed up to the room.
 17 Q. Objection; nonresponsive.
 18 My question, Mr. Galvan, is did you contact
 19 Hannah Crews once you obtained the room at the
 20 La Quinta?
 21 A. No.
 22 Q. If you did not contact Hannah Crews once you
 23 obtained the room, how did Ms. Crews know what room to
 24 go to?
 25 A. She showed up and was inside. Yeah, she showed

Page 90

1 up to the hotel room and was inside the hotel, and then
 2 we went to the room.
 3 Q. Okay. So you met her downstairs in the room?
 4 A. That's correct. In the hotel.
 5 Q. In the common area of the hotel?
 6 A. That's correct.
 7 Q. You then invited her to the room that you had
 8 rented, correct?
 9 A. We went to the room together.
 10 Q. Did she go to that room without your
 11 permission?
 12 A. I didn't ask her.
 13 Q. Mr. Galvan, did Hannah Crews go to your hotel
 14 room at the La Quinta without your permission?
 15 A. I don't understand the question. We both went
 16 to the hotel room.
 17 Q. And that's because you'd invited her to go up
 18 to your room, correct?
 19 A. We had agreed to meet there and go to the room.
 20 Q. Whose idea was that?
 21 A. It was both of ours.
 22 Q. Let's go back to this word defaming that you
 23 used in your original petition. You talked about two
 24 words as defaming, meaning false communications. One
 25 was seduction. The other one is manipulation. Do you

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1 remember that testimony?
 2 A. Yes.
 3 Q. Is it your contention in this lawsuit that
 4 communications stating that you had manipulated Hannah
 5 Crews were false?
 6 A. Yes.
 7 Q. Did you see any communications with any party,
 8 not you or your wife, any third party, where Blaine
 9 Crews used the word manipulation prior to filing this
 10 lawsuit?
 11 A. No.
 12 Q. You don't know if he used the word
 13 manipulation, do you?
 14 A. I don't know if he used the word manipulation.
 15 He used it with me and my wife.
 16 Q. Objection to the nonresponsive portion.
 17 You don't know if Mr. Crews communicated to
 18 any third party using the word manipulation, do you?
 19 A. No.
 20 Q. And you didn't at the time that you filed this
 21 lawsuit, did you?
 22 A. No, I did not.
 23 Q. And if Mr. Crews had called some third party
 24 and said, Mr. Richard Galvan had sex with my wife,
 25 Hannah Crews, when she was 17 and her parents were

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1 family friends of his, would there be anything untrue
 2 about that statement?
 3 A. Can you repeat that again?
 4 Q. Sure. If Mr. Crews had called a third party in
 5 2018 and said, Mr. Galvan had sex with Hannah Linn in
 6 2007, would there be anything untrue about that
 7 statement?
 8 A. No.
 9 Q. If Mr. Crews had said at that time Hannah Linn
 10 was 17 years old, would there be anything true about --
 11 untrue about that statement?
 12 A. No.
 13 Q. If he said at the time Hannah Linn was between
 14 her junior and senior year of high school, would there
 15 be anything untrue about that statement?
 16 A. No.
 17 Q. If he said at that time Hannah Linn went to
 18 North Way Bible Church, would there be anything untrue
 19 about that statement?
 20 A. No.
 21 Q. If he said at the time Mr. Galvan participated
 22 in mission -- raising money and helping with mission
 23 trips for the youth of North Way Bible Church, would
 24 there be anything untrue about that statement?
 25 A. Yes.

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1 Q. What is untrue about that statement?
 2 A. It was for the whole church.
 3 Q. Okay. Thank you for the clarification. The
 4 next sentence of this petition reads, On October 29th,
 5 2018, at 5:33 p.m. Plaintiffs received confirmation that
 6 Defendant Crews attempted to contact a school
 7 administrator of plaintiffs' children's school. Do you
 8 see that sentence?
 9 A. Yes.
 10 Q. Okay. On October 29th how did you receive
 11 confirmation as described in that sentence?
 12 A. I received a call from -- I received a call
 13 from Mrs. Tammy Johnson, a cell phone, and the actual
 14 person on the phone was Mrs. Karen Ziezal [phonetics],
 15 and Mrs. Karen Ziezal stated that Blaine Crews had
 16 contacted Tammy Johnson and had sent her similar
 17 information that he had discussed from my understanding
 18 with the church.
 19 Q. Did you see or review any of the actual
 20 communications Mr. Crews made to the school?
 21 A. No.
 22 Q. Did your wife have any involvement in
 23 communicating with the school?
 24 A. No.
 25 Q. Were those calls or that communication with the

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1 school was via telephone call or was it via text
 2 message?
 3 A. I believe that he tried contacting her many
 4 times on various venues of communication.
 5 Q. Let me clarify. Your communication with the
 6 school, was that on a phone call or was it via text
 7 message or email?
 8 A. It was a phone call.
 9 Q. Just one call?
 10 A. Yes.
 11 Q. Did you have any subsequent calls with the
 12 school about Mr. Crews?
 13 A. No.
 14 Q. Did you wife?
 15 A. No.
 16 Q. Through all these communications that we have
 17 covered thus far in this petition and all the
 18 conversation that you have discussed thus far in your
 19 deposition on the subject of Blaine Crews and Hannah
 20 Crews, were there any statements to your knowledge ever
 21 made by Hannah Crews?
 22 A. When Blaine -- when I had called Blaine and he
 23 acknowledged that Hannah was there in the room with him
 24 and he went on to threaten us and our children, it was
 25 our understanding that she was there with him on the

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1 phone in the room.
 2 Q. Did she say anything to you?
 3 A. She never said anything.
 4 Q. Did she say anything to your wife?
 5 A. No.
 6 Q. At the time that you filed this lawsuit did you
 7 have any knowledge that Hannah Crews had communicated
 8 with the church?
 9 A. No.
 10 Q. Did you have any knowledge that Hannah Crews
 11 had communicated with the school?
 12 A. No.
 13 Q. Had Hannah Crews made any communications with
 14 your wife?
 15 A. No.
 16 Q. Had she made any communications with you?
 17 A. No.
 18 Q. The last sentence of this Facts section reads,
 19 Defendant Blaine Crews's actions have caused Plaintiffs
 20 to experience feelings of great fear, intimidation and
 21 mortification. Do you see that sentence?
 22 A. Yes.
 23 Q. What did you fear that you're referring to in
 24 that sentence?
 25 A. That he would not stop until our children's

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1 lives, daily lives, would be affected, that he would not
 2 stop until they were harmed in some way. That he --
 3 that if I ever did anything with a church that he would
 4 ensure that I would be harmed as well. That after he
 5 called the church and the school, we were mortified
 6 that -- we wouldn't know what he would do. He could
 7 show up at the school. He could show up to our church
 8 services. He could show up to our house. And he
 9 just -- so we lived in fear.
 10 Q. Okay.
 11 A. Lived in fear that he would shoot me, put a
 12 bullet in my head, just constant fear of doing something
 13 to the kids. All right. If he's calling the church and
 14 the school, then that was our -- you know, we feared
 15 that he would show up to the school, that he would try
 16 to do something to them, that he would try to hit them,
 17 he would try to hurt them because he said he wouldn't
 18 stop until he made sure that they were affected, that he
 19 made sure that they were affected.
 20 Q. I'm going to go back up, scroll back up to page
 21 two of your petition, last sentence of the paragraph
 22 before the end of the page. Defendant Blaine Crews
 23 claimed on his phone -- claimed this phone call would
 24 not be the end and plaintiffs' children would learn as
 25 well. Do you see that sentence?

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1 A. Yes.
 2 Q. Is that true and correct?
 3 A. Yes.
 4 Q. Is that a threat to your children the way that
 5 sentence reads?
 6 A. Absolutely.
 7 Q. Is the threat to your children the fact that
 8 they might find out that their father had sex with a
 9 17-year-old high school student, not his wife?
 10 A. No, the threat to our children is that they
 11 would learn to live in fear and intimidation and
 12 mortification, that they would be threatened and that
 13 they would learn what that felt like.
 14 Q. You've testified earlier that Mr. Crews never
 15 made any threat of any imminent harm to either you, your
 16 wife or your children. That was your testimony just a
 17 few minutes ago in this deposition. Do you remember
 18 that?
 19 MS. NIX: Objection; form.
 20 THE WITNESS: No.
 21 Q. (BY MR. CHAPMAN) You don't remember that
 22 testimony?
 23 A. I remembering you asking me if he threatened
 24 me.
 25 MS. NIX: Objection; form.

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1 THE WITNESS: I don't remember.
 2 MS. NIX: I believe the words were imminent
 3 physical harm.
 4 Q. (BY MR. CHAPMAN) Any imminent physical harm.
 5 Do you understand the clarification now? Do you
 6 remember that testimony?
 7 A. Yes.
 8 Q. Okay. Mr. Galvan, you were fearful that
 9 Mr. Crews would out you as somebody that had sex with a
 10 high school student when you were 38 and she was 17;
 11 isn't that right?
 12 A. No.
 13 Q. You didn't care about that at all?
 14 A. No, I care about my kids. I care about my
 15 wife. I cared about what he was going to do to them.
 16 Q. You didn't care about people at the church
 17 finding out about that situation?
 18 A. No.
 19 Q. You didn't care about the people at the school
 20 finding out about that situation?
 21 A. Of course I care. Of course I do.
 22 Q. Did you fear that they would?
 23 A. Did I fear that they would?
 24 Q. Yes.
 25 A. I didn't fear if they would or if they would

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1 not. Of course I would care.
 2 Q. Would it be fair to describe if the church,
 3 people at the church, had found out that you had had sex
 4 with a 17-year-old high school student while you were a
 5 38-year-old married man, would it be fair to say that
 6 you would be mortified by that knowledge spreading
 7 through your church?
 8 A. I don't know.
 9 Q. Okay. We have been going about another hour
 10 and 15 minutes. I'm going to take a short break. Let's
 11 all stretch our legs and get a drink or whatever we need
 12 to do, go to the bathroom, and we'll come back in about
 13 five minutes. Is that all right with you, Mr. Galvan?
 14 A. That's fine.
 15 MR. CHAPMAN: Thank you.
 16 COURT REPORTER: We're off the record.
 17 (Recess from 12:34 to 12:45.)
 18 MR. CHAPMAN: Before we get back to the
 19 questioning, counsel and I have spoken during the break,
 20 and to the extent that I ask for Texas driver's
 21 licenses, Social Security numbers and the like to be
 22 provided by counsel, I have agreed that those -- that
 23 identifying information, numerical information and
 24 identifying information, will not be shared outside my
 25 office for any purpose. It's for identification

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1 purposes for the plaintiff. It will be redacted from
 2 any records that are filed and the like, and it won't be
 3 used outside of this procedure or the internal parts of
 4 this procedure for identifying purposes. Is that
 5 correct, Counsel?
 6 MS. NIX: Yes, sir, that's correct. That
 7 is our agreement, and I appreciate that, Mr. Chapman.
 8 MR. CHAPMAN: All right. Thank you. Just
 9 to be clear, I don't know that we'll ever get this far,
 10 but to the extent if I ask a court reporter to seek out
 11 some sort of records that may later be identified and
 12 that information was needed to get those, that will only
 13 be in something that I send to you for that purpose. Do
 14 you understand that?
 15 MS. NIX: Yes, sir.
 16 MR. CHAPMAN: Okay. All right. Let's get
 17 back on the record then.
 18 Q. (BY MR. CHAPMAN) We had come through the
 19 fact -- factual -- fact parts of your original petition,
 20 Mr. Galvan, and we have been reading from that, correct?
 21 A. That's correct.
 22 Q. Going up on the Exhibit 2 that we have been
 23 using, the facts start on page two and go through the
 24 bottom of page -- almost to the bottom of page three,
 25 correct?

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1 A. Yes.
 2 Q. I'm sorry. I didn't mean to confuse you by
 3 scrolling. With respect to that Facts section as pled
 4 in 2018, are there any factual statements contained in
 5 that section as we sit here today that you would say are
 6 not true and correct?
 7 A. No.
 8 Q. Let's move on along then to the next section at
 9 the bottom of page three. There's a heading called
 10 Causes of Action. Do you see that?
 11 A. I do.
 12 Q. Okay. And you understand that these are the
 13 legal causes of action that you brought against my
 14 clients, Blaine and Hannah Crews, back in November 2018,
 15 do you not?
 16 A. Yes.
 17 Q. Okay. First subheading there says Request for
 18 Permanent Injunction Against Defendants. Do you see
 19 that?
 20 A. Yes.
 21 Q. At the time that you filed this case what was
 22 your understanding of a permanent injunction?
 23 A. That -- I believe that it was -- that there
 24 would be no communication, they would be prohibited from
 25 contacting and communicating with -- in regards to

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1 allegations of manipulation and seduction with our
 2 family members, immediate family, friends, place of
 3 worship of attendance, schools of attendance, anywhere
 4 our kids would be associated, our clients and potential
 5 clients and such.
 6 Q. Okay. You understood the word injunction or to
 7 enjoin meaning you were seeking a court order to stop
 8 them from making communications, correct?
 9 A. Yeah, I was seeking -- yes, that's correct.
 10 Q. And you wanted the -- you wanted the district
 11 court in Cameron County, Texas to order that both Blaine
 12 and Hannah Crews could not make any communications on
 13 this subject, correct?
 14 A. That's correct.
 15 Q. Let's look at this first sentence. Plaintiffs
 16 requested injunctive relief includes that the Court
 17 enjoin Defendants from communicating, regardless of any
 18 form or fashion, in any way -- that's communicating in
 19 any way -- and then back on the petition, regarding any
 20 actions or occurrences, alleged or otherwise, between
 21 Plaintiffs and Defendants, particularly associated with
 22 allegations of manipulation, seduction or otherwise. Do
 23 you see that sentence?
 24 A. Yes.
 25 Q. And that was your -- that accurately frames

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1 your request to this court as of November 2018, correct?
 2 A. That's correct.
 3 Q. And then the next sentence goes on, to anyone.
 4 Do you see that? Top of page four. Let me scroll up.
 5 It's right -- I don't know if you can see my -- do you
 6 see my mouse or whatever?
 7 A. Right.
 8 Q. Okay. So you wanted Mr. Blaine Crews, my
 9 client, and Ms. Hannah Crews, my client, to be court
 10 ordered not to communicate about the subject matter of
 11 things between you and them, correct?
 12 MS. NIX: Objection; form.
 13 THE WITNESS: It's with the allegations of
 14 manipulation and seduction.
 15 Q. (BY MR. CHAPMAN) Okay. And anything
 16 associated with the allegations of manipulation and
 17 seduction, correct?
 18 A. It's in particularly associated.
 19 Q. Okay. Particularly associated with those
 20 allegations, correct?
 21 A. That's correct.
 22 Q. And you would certainly agree with me that a
 23 sexual encounter would be associated with those
 24 allegations, correct?
 25 A. No.

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1 Q. Why not?
 2 A. Because you're -- because of the manipulation
 3 and seduction aspect.
 4 Q. What's the word after seduction on the top line
 5 of page four?
 6 A. Or otherwise.
 7 Q. There you go. So particularly associated with
 8 allegations of manipulation, seduction or otherwise.
 9 You see that was your phrase that you asked your lawyers
 10 to prepare and asked this court for relief on, correct?
 11 MS. NIX: Objection; form.
 12 Q. (BY MR. CHAPMAN) Is that correct?
 13 A. That is a -- that is conversation between my
 14 attorney and I, correct?
 15 Q. I'm just talking about the pleading here, sir.
 16 Again, I don't want anything --
 17 A. Well, it does say otherwise.
 18 Q. Yeah. You're not telling this court and this
 19 judge and jury in this case as we sit here today that
 20 you weren't trying to stop Blaine and Hannah Crews from
 21 talking about your sexual encounter, are you?
 22 MS. NIX: Objection; form.
 23 THE WITNESS: No, I wasn't trying to stop
 24 them from talking about our sexual encounter. I didn't
 25 want him at our schools. I didn't want him at our

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1 church or our place of residence. I didn't want him
 2 to -- with allegations of manipulation and seduction.
 3 Q. (BY MR. CHAPMAN) You didn't want him to talk
 4 about your sexual encounter at those places as well,
 5 correct?
 6 MS. NIX: Objection; form.
 7 THE WITNESS: The allegations of
 8 manipulation and seduction.
 9 Q. (BY MR. CHAPMAN) Objection; nonresponsive.
 10 Were you also seeking that Mr. Crews and
 11 Ms. Crews not be able to talk about the sexual encounter
 12 to the church and the school?
 13 A. No.
 14 Q. That wasn't part of this lawsuit?
 15 A. No.
 16 Q. And you wanted Mr. and Mrs. Crews to be
 17 permanently enjoined from coming within 1,000 feet of
 18 you and your family members, correct?
 19 A. Yes.
 20 Q. You were seeking to enjoin both their freedom
 21 to speak, correct?
 22 A. No.
 23 Q. You weren't trying to enjoin their freedom to
 24 speak?
 25 A. No, I was not. To lie, yes, but not freedom to

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1 speak.

2 Q. You were -- you were trying to enjoin them from

3 making communications, correct?

4 A. To lie? Is that -- if that's communications,

5 then yes.

6 Q. Okay. Objection; nonresponsive.

7 You were trying to enjoin them from making

8 certain communications, correct?

9 A. Your allegations about manipulation and

10 seduction in regards to that communication, that is

11 correct. I don't want him 1,000 feet from our kids

12 because he had already threatened to put a bullet in my

13 head. They could get shot. I didn't want him to

14 continue to seek out having our kids learn what it was

15 going to be like to live in fear and live in

16 mortification. That's what I didn't want. I didn't --

17 I wanted him to stop harassing my wife.

18 Q. Okay. You were trying -- objection to the

19 nonresponsive portion.

20 You were also trying to enjoin their

21 physical freedom, correct?

22 A. No.

23 Q. You weren't trying to keep them 1,000 feet away

24 from you and any family member? You were, weren't you?

25 A. Yes.

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1 Q. So you were trying to enjoin their physical

2 freedom to go where they wanted to go, correct?

3 A. I was -- we sought this so that they wouldn't

4 come around our kids, where our family was, our family,

5 where -- the churches that we went to. That's what we

6 did.

7 Q. Correct. So places like a church that they

8 would otherwise be free to go to, you were trying to

9 enjoin their physical freedom to go there, correct?

10 A. No.

11 Q. Is that correct, sir?

12 A. No.

13 Q. Well, if they couldn't come within 1,000 feet

14 of your family members, your home, your business,

15 attended churches and schools, you would agree that

16 certainly with respect to the church they would

17 otherwise have all the rights in the world to go there.

18 It's a public place, correct?

19 A. They had no legitimate reason to be there.

20 Q. Is that an opinion or a fact, sir?

21 A. Well, that's what I'm saying. They didn't have

22 a legitimate reason to be around there. Then, no, they

23 didn't need to be around my kids.

24 Q. You didn't want them to go to your church, and

25 you tried to enjoin them from staying 1,000 feet away

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1 from the church, correct?

2 A. I didn't want them to go to where my children

3 were at.

4 Q. Objection; nonresponsive. Sir --

5 A. My children attended church, and that's -- and

6 that's what I didn't want him to be at, where my

7 children were attending. That's what it says, school --

8 Q. You would agree -- I'm sorry. Go ahead, sir.

9 A. It says places of worship of attendance,

10 schools of attendance.

11 Q. Attended churches. Do you see that phrase?

12 A. I see places of worship of attendance.

13 Q. Okay. Court enjoined Plaintiffs from coming

14 within 1,000 feet of Plaintiffs or Plaintiffs' family

15 members and Plaintiffs' home. You didn't want them to

16 come within 1,000 feet of your home, correct?

17 A. Yes.

18 Q. You didn't want them to come within 1,000 feet

19 of your business, correct?

20 A. Yes.

21 Q. You didn't want them to come within 1,000 feet

22 of any church you attended, correct?

23 A. Yes.

24 Q. And you didn't want them to come within 1,000

25 feet of the schools where your children went, correct?

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1 A. That's correct.

2 Q. And to the extent that they would otherwise be

3 free to do those things, you were asking for an

4 injunction to prevent them from doing that, correct?

5 A. Yes.

6 Q. I'm going to scroll up a little bit. The cause

7 of action on page -- we're now on page four of

8 Exhibit 2. There's a subheading for Assault. Do you

9 see that subheading?

10 A. I do.

11 Q. Okay. It says, In addition, and/or in the

12 alternative to all other claims, Plaintiffs seek

13 recovery under a theory of assault, specifically

14 Defendant Blaine Crews intentionally or knowingly

15 threatened Plaintiffs -- Plaintiff Richard Galvan with

16 imminent bodily injury. Do you see that phrase?

17 A. Yes.

18 Q. That never happened, did it?

19 A. He stated that in 2007, if he would have

20 known -- actually, I take that back. If he would have

21 known when he met me what he believed allegedly

22 happened, he would have --

23 Q. Mr. Crews never threatened you with imminent

24 bodily injury --

25 A. -- put a bullet in my head.

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1 Q. Sorry. I apologize. I thought you were done,
 2 sir. Mr. Crews never threatened you with imminent
 3 bodily injury, did he?
 4 A. No.
 5 Q. But you allege that he did in this petition
 6 filed in November 2018, didn't you?
 7 A. Yes.
 8 Q. And on May 13th, 2020, which was yesterday, you
 9 filed a discovery response stating you were no longer
 10 making that contention, correct?
 11 A. Yes.
 12 Q. The next heading is Intentional Infliction of
 13 Emotional Distress. Do you see that heading?
 14 A. Yes.
 15 Q. With respect to the assault claim, you
 16 understood in this petition that you were seeking
 17 monetary damages relating to that, correct?
 18 A. I don't see it there.
 19 Q. Did you understand that you were asking for
 20 money from the Crewses in this lawsuit?
 21 MS. NIX: Objection; form.
 22 MR. CHAPMAN: What's the basis?
 23 MS. NIX: Legal opinion. And you
 24 haven't --
 25 MR. CHAPMAN: I asked for his -- I'm sorry.

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1 Go ahead.
 2 MS. NIX: And you haven't pointed out in
 3 the petition in the damages paragraph.
 4 MR. CHAPMAN: We're not there yet.
 5 Q. (BY MR. CHAPMAN) Was it your understanding
 6 when you filed this lawsuit in November 2018 that you
 7 were seeking significant monetary damages from the
 8 Crewses?
 9 A. No.
 10 Q. You didn't know that you were doing that in
 11 this petition?
 12 A. I -- you have to refresh my memory, if you
 13 don't mind. And all I see is this here, and this
 14 doesn't show me anything. Would you -- is there --
 15 Q. We'll get there. We're going to scroll
 16 through. But as we sit here today you're telling me
 17 that you don't remember whether you were seeking money
 18 from the Crewses in 2018?
 19 A. If it's in here in the petition, then yes. But
 20 can you scroll up? Is it in here?
 21 Q. We're going to do question and answer format,
 22 Mr. Galvan. I'm asking about your knowledge right now.
 23 With respect to your knowledge right now, you don't
 24 remember in 2018 whether or not you asked for damages
 25 against Mr. and Mrs. Crews in terms of money?

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1 A. No.
 2 Q. Okay. And your testimony is we'll need to
 3 refresh your recollection with that in this petition,
 4 correct?
 5 A. That's correct.
 6 Q. Let me ask you this question. Was the main
 7 part of this lawsuit -- excuse me. Strike that.
 8 Was the main point of this lawsuit for you
 9 when you filed it in 2018 to keep the Crewses from
 10 coming around?
 11 A. Coming around where?
 12 Q. You, your family, your churches, your schools.
 13 Was that the main point of the lawsuit in your mind?
 14 A. No.
 15 Q. What was the main point of the lawsuit?
 16 A. That they had intentionally inflicted emotional
 17 distress upon me and my family, on my wife, that he was
 18 going to continuously make my children and my wife's
 19 lives threatened, to stop untruths and to protect my --
 20 to protect the well-being of my kids and my wife.
 21 Q. All right. On the Intentional Infliction of
 22 Emotional Distress paragraph that's visible on our
 23 window right now in Exhibit 2, it says, In addition,
 24 and/or alternative of all other claims, Plaintiffs seek
 25 recovery under a theory of intentional infliction of

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1 emotional distress. Do you see that?
 2 A. I do.
 3 Q. Did you have at the time that you filed this
 4 petition in 2018 any understanding yourself of the
 5 elements necessary to recover under a theory of
 6 intentional infliction of emotional distress?
 7 A. No.
 8 Q. All right. The next sentence reads, Defendant
 9 Blaine Crews recklessly -- acted recklessly when he
 10 communicated such allegations of manipulation and
 11 seduction without any merit or physical proof. Do you
 12 see that sentence?
 13 A. Yes.
 14 Q. If something is true, why does somebody have to
 15 have physical proof about it before they communicate it?
 16 MS. NIX: Objection; form.
 17 THE WITNESS: I don't understand that
 18 question at all.
 19 Q. (BY MR. CHAPMAN) You're saying in this
 20 petition in that sentence that Mr. Crews acted
 21 recklessly because he communicated allegations without
 22 any, number one, merit or, number two, physical proof.
 23 Do you see that sentence where it says physical proof?
 24 A. I see allegations of manipulation -- yes --
 25 without any merit or physical proof.

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1 Q. Okay. We're going to set merit aside for now.
 2 We're going to talk about physical proof. Is it your
 3 position that Mr. Crews would have to have physical
 4 proof in order to communicate something that was true?
 5 MS. NIX: Objection; form.
 6 THE WITNESS: I still don't understand the
 7 question.
 8 Q. (BY MR. CHAPMAN) I'm asking you why the word
 9 physical proof is in this paragraph. Bottom line. Do
 10 you know?
 11 A. So that there's proof.
 12 Q. Why physical proof?
 13 A. Because it brings speculation. If --
 14 Q. If something was true with respect to the
 15 allegations in this petition but the person
 16 communicating it didn't have physical proof, in your
 17 opinion would that be reckless?
 18 MS. NIX: Objection; form.
 19 THE WITNESS: I still don't -- I still
 20 don't understand it. You're saying if, and so if is if.
 21 That's what I kind of get from your question.
 22 Q. (BY MR. CHAPMAN) I'm asking you, Mr. Galvan,
 23 if you believe it would be reckless just because
 24 somebody communicated something without physical proof?
 25 A. Without merit or physical proof? Yes.

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1 Q. No, I didn't -- objection; nonresponsive. Skip
 2 merit.
 3 A. The answer to your question is yes. Yes,
 4 without physical proof.
 5 Q. Okay. Would the same be with respect to merit?
 6 MS. NIX: Objection; form.
 7 THE WITNESS: Yes.
 8 Q. (BY MR. CHAPMAN) Okay. Plaintiffs suffered
 9 emotional distress when Defendant Blaine Crews
 10 communicated allegations to the Plaintiffs. Do you see
 11 that sentence?
 12 A. Yes.
 13 Q. And then comma and then it carries -- the same
 14 sentence carries on, Plaintiffs, Plaintiffs' place of
 15 worship and the children's school. You see that full
 16 sentence, correct?
 17 A. Yes.
 18 Q. What emotional distress did you suffer
 19 regarding the allegations contained in that sentence?
 20 MS. NIX: Objection; form.
 21 THE WITNESS: Well, he communicated to
 22 areas and called them where our children attend.
 23 Q. (BY MR. CHAPMAN) The next sentence reads,
 24 Defendant Crews's conduct was extreme and outrageous
 25 because of the nature and content of the statements and

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1 the pure lack of physical proof. Do you see that
 2 sentence?
 3 A. I do.
 4 Q. Okay. You are saying in this petition that
 5 Mr. Crews's conduct was outrageous and extreme because
 6 of the content of the statements and the lack of
 7 physical proof, correct?
 8 MS. NIX: Objection; form.
 9 THE WITNESS: Yeah, his conduct absolutely
 10 was extreme and outrageous. I agree with that.
 11 Q. (BY MR. CHAPMAN) And those two -- those two
 12 phrases, content of statements and pure lack of physical
 13 proof, are joined in that sentence by the word and,
 14 correct?
 15 A. That is how it is written.
 16 Q. Meaning that if physical proof -- if there was
 17 physical proof, then you don't think his statements
 18 would be outrageous?
 19 A. I think his conduct, whether it's his
 20 statements, his conduct in calling my kids' schools and
 21 calling my kids' churches, church, place of worship,
 22 where they were spending most of their time during the
 23 week and us on the weekend, is extremely outrageous of
 24 his conduct.
 25 Q. Let me -- let me ask you this question,

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1 Mr. Galvan. Let me back up from trying to talk about
 2 words in a sentence with you. Is there some reason when
 3 you filed this petition in 2018 that you thought it had
 4 to be important that Mr. Crews had physical proof of
 5 something?
 6 A. Well, he's alleging manipulation and seduction,
 7 and so that is exactly what we filed.
 8 Q. Okay.
 9 A. Emotional distress. I still don't understand
 10 the entirety of the association with physical proof, but
 11 that's -- that's the best I can actually answer.
 12 Q. I understand.
 13 A. I still don't know.
 14 Q. Let me ask you this question. In your opinion,
 15 what could be physical proof of manipulation and
 16 seduction?
 17 A. My opinion. It could be -- I don't know --
 18 pictures, maybe some communication, verification, those
 19 things.
 20 Q. I'm going to move along to the top of page five
 21 of this petition. It says, Further -- on the bottom of
 22 page four it says, Further, for argument purposes only,
 23 if the alleged actions that occurred twelve years ago
 24 were determined to be true, determined as true, such
 25 allegations are not actionable. When you filed this --

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1 do you see that? Do you see that part of it right
 2 there?
 3 A. Uh-huh. Yes.
 4 Q. Okay. And it goes on to say, as they are well
 5 beyond the statute of limitations and age of consent.
 6 A. Yes.
 7 Q. What statute of limitations are you talking
 8 about there in that petition?
 9 A. I don't know.
 10 Q. What age of consent are you talking about there
 11 in that petition?
 12 A. I don't know.
 13 Q. You don't know what that sentence means really,
 14 do you?
 15 A. Not -- not in its entirety.
 16 Q. The next cause of action under a heading on
 17 page five of Exhibit 2 is labeled Defamation Per Se. Do
 18 you see that?
 19 A. I do.
 20 Q. It says, In addition to and in the alternative
 21 to all other claims, Plaintiffs seek recovery under a
 22 theory of defamation per se. Do you see that?
 23 A. I do.
 24 Q. When you filed this petition, what did you
 25 understand defamation per se to mean?

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1 A. Accusations and allegations of turpitude, moral
 2 turpitude, criminality, involving loathsome diseases.
 3 Q. Okay. And that's found at the bottom of that
 4 paragraph, correct, in your petition?
 5 A. That's correct.
 6 Q. Okay. In 2018 why did you believe Mr. Crews's
 7 statements to third parties are so likely to injure the
 8 person's reputation that it should be considered
 9 defamation per se?
 10 A. Can you repeat the question, please?
 11 Q. Sure. In 2018 when this pleading was filed why
 12 did you believe Mr. Crews's statements are so likely to
 13 injure your reputation that they should be defamation
 14 per se? Do you have an understanding as to why you
 15 believe that what he said was defamation per se?
 16 A. He's saying that I, as a youth pastor, to
 17 seduce Hannah, a young woman.
 18 Q. Your testimony is here today that you weren't a
 19 youth pastor. That's correct, right?
 20 A. That's correct.
 21 Q. Okay. And your testimony today has been that
 22 you had sex with Hannah but you did not seduce her,
 23 correct?
 24 A. That's correct.
 25 Q. And your testimony has been that you did not

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1 manipulate her?
 2 A. That's correct.
 3 Q. But yet you claimed in your petition that --
 4 well, strike that.
 5 Is there anything that you recall in the
 6 factual statements in your petition where you say
 7 Mr. Crews said that you were a youth pastor?
 8 A. No.
 9 Q. Your next claim is under the heading Public
 10 Disclosure of Private Facts. Do you see that heading?
 11 A. Yes.
 12 Q. It says, In the alternative to the other
 13 counts, assuming for argument's sake Defendant Blaine
 14 Crews's allegations are true, Plaintiffs plead recovery
 15 under public disclosure of private facts. What was your
 16 understanding of that claim at the time this petition
 17 was filed?
 18 MS. NIX: Objection; form.
 19 THE WITNESS: I don't know.
 20 Q. (BY MR. CHAPMAN) Did you know that you were
 21 claiming that you should be entitled to money even if
 22 what Blaine was saying was true?
 23 MS. NIX: Objection; form.
 24 THE WITNESS: I don't.
 25 Q. (BY MR. CHAPMAN) You didn't know that at the

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1 time?
 2 A. No.
 3 Q. Okay. The next heading here is entitled Gag
 4 Order at the bottom of page five. Do you see that?
 5 A. Yes.
 6 Q. Okay. It says, The Court may issue a gag order
 7 if after hearing it finds there's a danger of imminent
 8 and irreparable harm to the judicial process which would
 9 deprive litigants of a just resolution to their dispute,
 10 and two, The action represents the least restrictive
 11 means to prevent the harm. Do you see that?
 12 A. Yes.
 13 Q. And then it goes on to say, When a court issues
 14 a gag order, it must identify the person to be
 15 restrained and identify the limits of the restraint. Do
 16 you see that?
 17 A. Yes.
 18 Q. And then the last word on page five, The gag
 19 order requested in this motion asks the Court to
 20 restrain Defendants from making any reference,
 21 intentionally, willfully or negligently, of any kind
 22 related to any pending litigation between the Plaintiffs
 23 and Defendants and the associated allegations within the
 24 litigation. Do you see that?
 25 A. Yes.

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1 Q. So what you are wanting to do in this was stop
 2 the Crewses from communicating anything while this case
 3 was going on, correct?
 4 A. Yes.
 5 Q. Was that the main point of your lawsuit against
 6 the Crewses in your mind when you filed this in 2018?
 7 A. No.
 8 Q. Okay. All right. This should answer some
 9 questions that we had before about what you were
 10 seeking. The next heading is titled Exemplary Damages.
 11 Do you see that?
 12 A. Yes.
 13 Q. Based on the intentional torts and gross
 14 negligence committed by the Defendants alleged herein
 15 above, Plaintiffs seek an award of exemplary damages of
 16 and from the Defendants in an amount within the
 17 jurisdictional limits of this Court. Do you see that?
 18 A. Yes.
 19 Q. That's asking for an award of money to punish
 20 Blaine and Hannah Crews, correct?
 21 MS. NIX: Objection; form.
 22 THE WITNESS: I don't know.
 23 Q. (BY MR. CHAPMAN) Is it seeking an award of
 24 money?
 25 A. I don't know.

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1 Q. Did you know at the time that you were seeking
 2 money from Blaine and Hannah Crews based on this
 3 paragraph?
 4 A. No.
 5 Q. Did you read this paragraph before you verified
 6 the petition?
 7 A. Yes.
 8 Q. And you didn't read that to understand that you
 9 were seeking an award of exemplary damages, meaning
 10 money, from the Defendants?
 11 A. Yes.
 12 Q. You knew that, right?
 13 A. I'm sorry. Can you repeat the question?
 14 Q. You knew you were seeking money from the
 15 Defendants when you filed this lawsuit.
 16 A. Yes.
 17 Q. And then at the bottom of page six there's a
 18 heading entitled Application for Temporary Restraining
 19 Order, correct?
 20 A. Yes.
 21 Q. And that goes on for a bit with some citations.
 22 As somebody that's not a lawyer, you weren't familiar, I
 23 take it, with the particular legal requirements of
 24 obtaining a temporary restraining order from a court
 25 when you filed this, correct?

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1 A. Right.
 2 Q. And that's something you left up to your
 3 attorney?
 4 A. That's correct.
 5 Q. As an aside, at the time that this petition was
 6 filed on November 5th, 2018, had Mr. Jim Young started
 7 to work for you as well?
 8 A. I don't believe so.
 9 Q. And then there's another section on Temporary
 10 Injunction on page eight, at the bottom of page eight.
 11 Do you see that? I'm about to scroll up to the next
 12 page. Do you see that heading?
 13 A. Yes, I do.
 14 Q. And as somebody that's not a lawyer, you
 15 wouldn't be in a position as we sit here today to offer
 16 any commentary about the merits of a temporary
 17 injunction, correct?
 18 A. Correct.
 19 Q. You were seeking your attorneys' fees to be
 20 paid by Blaine and Hannah Crews, correct?
 21 A. Correct.
 22 Q. And that's found on page nine of this petition
 23 under a heading called Attorneys' Fees, correct?
 24 A. Yes.
 25 Q. And then there's a heading titled Conditions

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1 Precedent, All conditions precedent to the Plaintiffs'
 2 claims have been performed or have occurred. As a
 3 layperson, do you have any understanding what that meant
 4 in your petition at the time you filed it?
 5 A. No.
 6 Q. Do you see a section after that entitled
 7 Prayer?
 8 A. Yes.
 9 Q. Okay. It starts out, Wherefore premises
 10 considered, Plaintiffs pray that Defendants be cited to
 11 appear and answer herein and after final trial hereof
 12 that the Plaintiffs -- it says shave judgment. I submit
 13 to you that's most likely a typo and ask you to
 14 understand that to mean have judgment -- against
 15 Defendants as follows. You understand this is your
 16 request for a judgment in this lawsuit that you filed,
 17 correct?
 18 A. Yes.
 19 Q. And A is, Actual and special damages from
 20 Defendants in an amount no less than \$335,000 associated
 21 with Plaintiffs' claim of defamation plus \$500,000
 22 associated with pain and suffering as requested
 23 hereinabove. Do you see that sentence?
 24 A. Yes.
 25 Q. Would you agree with me that you filed a

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1 petition against Blaine Crews asking for at least
 2 \$835,000 on November 5th, 2018?
 3 A. Yes.
 4 Q. With respect to the claim for defamation and
 5 the \$335,000 you requested, did you make any calculation
 6 to get to that number before you filed this pleading?
 7 A. I don't know.
 8 Q. Do you know where that number came from?
 9 A. No.
 10 Q. Okay. With respect to the \$500,000 number that
 11 comes right after that, do you see that?
 12 A. Yes.
 13 Q. If I say half a million dollars, it's the same
 14 thing, right?
 15 A. Correct.
 16 Q. You're asking for half a million dollars
 17 associated with damages associated with pain and
 18 suffering. Do you see that?
 19 A. Yes.
 20 Q. What pain and suffering were you asking a half
 21 a million dollars -- to be compensated a half a million
 22 dollars in relation to?
 23 A. Blaine's continued action to ensure that my
 24 children's lives would be threatened, that they would
 25 live in fear, mortification, that he would not stop. We

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1 lost sleep, headaches, emotional pain, and still living
 2 in fear.
 3 Q. All right. Going back up a minute to recount
 4 the causes of action you pled in this lawsuit when you
 5 first filed it, you asked for causes of action -- you
 6 asked for injunction. Do you see that where I'm
 7 pointing to on the exhibit?
 8 A. Yes.
 9 Q. You made a claim of assault, correct?
 10 A. Uh-huh. Correct.
 11 Q. Associated with a threat of imminent bodily
 12 injury, according to your pleading at the time, correct?
 13 A. Yes.
 14 Q. You made a claim for intentional infliction of
 15 emotional distress. Do you see that?
 16 A. Yes.
 17 Q. Defamation per se. Do you see that?
 18 A. Yes.
 19 Q. Public disclosure of private facts. Do you see
 20 that?
 21 A. Yes.
 22 Q. Gag order. Do you see that?
 23 A. Yes.
 24 Q. And exemplary damages. Do you see that?
 25 A. Yes.

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1 Q. Temporary restraining order. Do you see that?
 2 A. Application. Yes.
 3 Q. And there's an attorneys' fee and a damages
 4 section down here, and we went over those, correct?
 5 A. Correct.
 6 Q. With respect -- let me go back up here -- to
 7 your claim for assault, you voluntarily nonsuited that
 8 with prejudice this year in 2020, did you not?
 9 A. Yes.
 10 Q. You believe as we sit here today that Mr. Crews
 11 committed an assault against you and your wife?
 12 A. No.
 13 Q. What has changed from 2018 to 2020 to make you
 14 change your mind?
 15 A. I have, and my attorney, Mrs. Nix.
 16 Q. That's based on consultation with Mrs. Nix?
 17 A. Yes.
 18 Q. With respect to intentional infliction of
 19 emotional distress, do you believe as we sit here in
 20 2020 that you have a claim against Blaine Crews and
 21 Hannah Crews for intentional infliction of emotional
 22 distress?
 23 MS. NIX: Objection; form.
 24 THE WITNESS: I don't know how to answer
 25 that.

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1 Q. (BY MR. CHAPMAN) Okay. Let me ask it this
 2 way. We'll do it the same way we did the other. You
 3 voluntarily nonsuited with prejudice your claims of
 4 intentional infliction of emotional distress for both
 5 you and your wife, correct?
 6 A. Yes.
 7 Q. As we sit here in 2020, do you believe that you
 8 had claims for emotional -- intentional infliction of
 9 emotional distress against Crewses?
 10 A. Yes.
 11 Q. Why did you nonsuit them?
 12 A. Consultation with my attorney, Mrs. Nix.
 13 Q. There's a claim for public disclosure of
 14 private facts. You voluntarily nonsuited that claim
 15 with prejudice, correct, sir?
 16 A. That's correct.
 17 Q. As we sit here today in 2020, do you believe
 18 that you had a cause of action for public disclosure of
 19 private facts back in 2018?
 20 A. No.
 21 Q. What has made you change your mind from 2018 to
 22 2020 about whether or not you had this claim for public
 23 disclosure of private facts?
 24 A. Consultation with my -- our attorney.
 25 Q. I don't want to know anything that you said

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1 about -- well, about this lawsuit -- I don't want
 2 anything you said with Ms. Nix or she said to you, but I
 3 do want to know when you first consulted with Ms. Nix?
 4 MS. NIX: Objection; form.
 5 Q. (BY MR. CHAPMAN) You can answer.
 6 A. That would be something that I would have
 7 discussed with Ms. Nix and you said you didn't want to
 8 know anything I discussed with Ms. Nix.
 9 MS. NIX: No, but with regard to the date.
 10 THE WITNESS: Oh, the date?
 11 Q. (BY MR. CHAPMAN) I just want to know when did
 12 you first contact Ms. Nix in relation to this case?
 13 What date?
 14 A. I don't recall.
 15 Q. You agree with me that you acted as pro se
 16 counsel, pro se meaning you represented yourself in this
 17 period of time -- for a small period of time in this
 18 case, correct?
 19 A. That's correct.
 20 Q. And you filed nonsuits in this case of your
 21 causes of action before Ms. Nix was involved, correct?
 22 A. That's correct.
 23 Q. Okay. When you filed your nonsuits as pro se,
 24 you filed a nonsuit of your public disclosure of private
 25 facts claim by yourself without a lawyer, correct?

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1 A. That's correct.
 2 Q. What changed between 2018 and 2020 to make you
 3 dismiss your nonsuit, your public disclosure of private
 4 facts claim?
 5 A. I don't understand your question. I'm sorry.
 6 Q. You filed a nonsuit of your public disclosure
 7 of private facts claim representing yourself.
 8 A. Uh-huh.
 9 Q. And I asked -- my question is what changed
 10 between 2018 and 2020 when you filed that representing
 11 yourself to make you nonsuit that claim?
 12 A. Just consultation with Travis and Jim before
 13 withdrawal.
 14 Q. Consultation with your prior attorneys?
 15 A. That's correct, before they withdrew.
 16 Q. Would the same be true of all your nonsuits
 17 that you filed as a pro se?
 18 A. Yes.
 19 Q. Were those actually filed from Jim Young's
 20 E-Filing account?
 21 A. Excuse me?
 22 Q. Were those nonsuits filed from Jim Young's
 23 E-file account?
 24 A. I don't -- I don't know. I don't know.
 25 Q. You didn't file them yourself electronically,

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1 correct?
 2 A. Myself?
 3 Q. Yes.
 4 A. I'm sorry. I'm a little confused. You asked
 5 me --
 6 Q. Just to be clear here, Mr. Galvan, you were
 7 acting as your own counsel for a period of time, but
 8 when you filed some of the things that you filed as pro
 9 se, meaning acting as your own counsel, you didn't log
 10 in and register an account with the Texas E-filing
 11 system and file those under an account that you made up
 12 to do that; you used Jim Young's electronic filing
 13 account, correct?
 14 A. No, I did my own. I have an account with
 15 E-file.
 16 Q. Okay. Thank you. All right. I'm going to
 17 go -- there's an affidavit verification from Sonia, but
 18 let's go to yours. You understood at the time that you
 19 filed this lawsuit November 2018 that your petition
 20 needed to be verified by some sworn statements, correct?
 21 A. Yes. I'm sorry. Say that again.
 22 Q. Your petition filed in October -- I mean --
 23 excuse me -- November 5th of 2018 needed to be supported
 24 by some sworn statements that were notarized, correct?
 25 A. I don't know.

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1 Q. Well, you provided a sworn statement, correct,
 2 in conjunction with the petition?
 3 A. That's correct.
 4 Q. And you don't know why you needed to do that?
 5 A. No.
 6 Q. Okay. The first paragraph of this that I have
 7 up now -- and it's page -- I can't tell what page this
 8 is. Is it numbered? I don't think it's numbered. You
 9 recognize this verification that you filed, correct,
 10 that's attached to the back of Exhibit 2?
 11 A. Yes.
 12 Q. Okay. It says -- the first quoted paragraph
 13 for you says you were admin-- well, it says you were
 14 administered oath and then you said the following: My
 15 name is Richard Galvan. I have read the Plaintiffs'
 16 petition -- original petition and application for
 17 temporary restraining order and the facts stated therein
 18 are within my personal knowledge and are true and
 19 correct.
 20 MS. NIX: Mr. Chapman, not to cut you off,
 21 but Sonia just returned with lunch, if it would be --
 22 MR. CHAPMAN: Okay. That's perfect.
 23 Before we get into this let's take a short break.
 24 Whatever y'all -- do you want 30 minutes?
 25 MS. NIX: Yes, please.

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1 MR. CHAPMAN: Okay. Thank you. Yes, thank
2 you.
3 (Recess from 1:30 to 2:08.)
4 Q. (BY MR. CHAPMAN) Okay. Mr. Galvan, we had
5 spent some time going through your original lawsuit in
6 this case that was filed by you and your wife against
7 both Blaine Crews and Hannah Crews, correct?
8 A. Correct.
9 Q. And on this verification that was attached to
10 the back of the lawsuit it says that you have read the
11 original petition and application for temporary
12 restraining order and the facts stated therein are
13 within my personal knowledge and are true and correct.
14 Do you see that statement?
15 A. Yes.
16 Q. Okay. Is there anything about that that's
17 inaccurate as we sit here today?
18 A. No, I don't --
19 Q. And you signed this under oath in front of a
20 notary, correct?
21 A. Correct.
22 Q. Okay. And your wife signed a similar affidavit
23 in front of a notary as well, correct?
24 A. Correct.
25 Q. Okay. All right. After you filed this

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1 petition and served my client, at some point shortly
2 thereafter, I believe, on or about the 11th or 12th of
3 December, I filed on behalf of my client some motions to
4 dismiss your claims. You understood that that happened,
5 correct?
6 A. Yes.
7 Q. Okay. And that I on behalf of the Crewses were
8 seeking to have the court throw out some of your claims,
9 correct?
10 A. Correct.
11 Q. Okay. And you received those motions back
12 around the time that they were filed, correct?
13 A. I guess. I don't know. I guess so. I don't
14 know.
15 Q. Okay. Let me ask you this question. I filed
16 what's called a 91-A motion to dismiss, and one of the
17 things that I talked about in there was the fact that to
18 the extent your pleadings reflected an assault or
19 alleged an assault by Hannah Crews or defamation by
20 Hannah Crews or intentional infliction of emotional
21 distress by Hannah Crews, that was not covered in your
22 pleadings and you should have to drop the things being
23 brought against Hannah Crews who was a named defendant
24 in the case. Did you understand that at the time?
25 A. I'm not sure I understand it now.

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1 Q. Okay. Let me ask, Mr. Galvan, did you
2 understand that we were trying to dismiss some things
3 because you were bringing causes of action against
4 Hannah Crews for things that she did not do?
5 A. No.
6 Q. Who -- is that Mr. Galvan that said that?
7 A. Yeah, it's me.
8 Q. Okay. You would agree with me that Hannah
9 Crews didn't commit any assault against you or your
10 wife, correct?
11 A. Correct.
12 Q. And you already testified that she didn't make
13 any statements to any third parties, correct?
14 A. I don't know.
15 Q. You don't know that she made any?
16 A. That's correct.
17 Q. And to the extent your attorneys argued against
18 dismissing those claims, I'm going to take it you don't
19 have any understanding as to their reasoning for that?
20 A. No, I don't.
21 Q. I also filed -- I'm sure you're aware of
22 this -- a motion to dismiss your case for defamation per
23 se related to what's called the Texas Citizens
24 Participation Act, which is commonly called the
25 Anti-SLAPP statute. That's something you know from your

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1 experience in this litigation, correct?
2 A. Yes.
3 Q. And in conjunction with that I filed affidavits
4 from -- in particular from Hannah Crews, correct?
5 A. Yes.
6 Q. And you had a chance to review that affidavit,
7 correct?
8 A. I think so. I believe so, yes.
9 Q. Okay. Before we get to that, let me -- let me
10 jump back here. I'll represent to you I filed those
11 motions, and then at some point you filed or your
12 attorneys caused to be filed a first amended petition,
13 which is a modified version of the original filing. In
14 the interest of efficiency -- excuse me. In the
15 interest of efficiency I don't want to go through that
16 action by action, but I have pulled it up, Ms. Rimmer,
17 and I will attach all 19 pages of it. The fax cover
18 sheet says 42 but the petition was just 19. I'm going
19 to attach the 19 pages of the First Amended Original
20 Petition filed on February 8th, 2019, as Exhibit 3.
21 Mr. Galvan, you don't dispute that your
22 attorneys in this case filed an amended petition on or
23 about February 8th, do you?
24 A. No.
25 Q. Okay. And that petition contained the same

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1 allegations, essentially the same allegations with some
 2 amendments that we may talk about but the same causes of
 3 action, and I don't want you to take my word for it.
 4 I'm going to scroll through here quickly. Do you see
 5 Request For Permanent Injunction Against Defendants?
 6 A. Yes.
 7 Q. Do you see the Assault heading?
 8 A. Yes.
 9 Q. Do you see the Intentional Infliction of
 10 Emotional Distress heading?
 11 A. Yes.
 12 Q. Do you see the Defamation Per Se heading?
 13 A. Yes.
 14 Q. Do you see the Public Disclosure of Private
 15 Facts heading?
 16 A. Yes.
 17 Q. With respect to defamation per se, it says
 18 there on the first part of it -- that's something I
 19 probably should have covered in the other petition --
 20 first line, In addition to all other claims, Plaintiffs
 21 seek recovery under a theory of defamation per se. Do
 22 you see that?
 23 A. Yes.
 24 Q. Have you identified any statements in your
 25 deposition today that were defamatory as to your wife

Page 139

1 Sonia Galvan?
 2 A. I don't understand that question. I'm sorry.
 3 Q. Yeah. We were trying to define defamation
 4 earlier, and you were talking about it was something
 5 false or bad that was said. Do you remember that, some
 6 of that testimony?
 7 A. Yeah, untrue.
 8 Q. Untrue. There aren't any things in your
 9 lawsuit pleadings about statements made about your wife
 10 that were untrue, correct?
 11 A. I don't know. I'm sorry. I don't.
 12 Q. Well, Blaine didn't call the church or the
 13 school to talk about your wife, he called to talk about
 14 you; is that fair?
 15 A. Blaine called and told people that she knew, I
 16 believe.
 17 Q. Okay. Okay.
 18 A. So yeah.
 19 Q. Thank you for clarifying, Mr. Galvan. With
 20 respect to any statement by Blaine that said she knew,
 21 is it your contention that that statement was false?
 22 A. When? When would that be?
 23 Q. Back when you filed this petition in 2018.
 24 A. Okay. You're kind of losing me, so I
 25 apologize.

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1 Q. Okay. I'll try to be more clear. In 2018 when
 2 you filed your lawsuit, did your wife, Ms. Sonia Galvan,
 3 know about the 2007 incident with Hannah at the hotel,
 4 the La Quinta Hotel?
 5 A. Yes.
 6 Q. Okay. And the only statement she heard Blaine
 7 say were the same ones that you heard on the phone call,
 8 correct?
 9 A. Yes.
 10 Q. And she didn't have any communications -- she,
 11 being your wife Sonia, didn't have any communications
 12 with the church or the school. That was you that did
 13 that, correct?
 14 A. I'm sorry. Say that again.
 15 Q. Your wife didn't -- Sonia didn't have any
 16 communications with the church or the school, correct?
 17 A. That's correct.
 18 Q. Okay. So is your wife's knowledge defamatory
 19 only in the same sense that you're alleging defamatory
 20 statements, that she knew that you had had this incident
 21 with Hannah in 2007 but she did not know of anything
 22 that constituted manipulation or seduction. Is that a
 23 fair statement of your position?
 24 MS. NIX: Objection; form.
 25 THE WITNESS: I don't -- didn't know in

Page 141

1 2007? Is that --
 2 Q. (BY MR. CHAPMAN) In 2000 --
 3 A. Know what?
 4 Q. In 2000 --
 5 A. 2007?
 6 Q. Okay. Yeah. In 2018 it's your position, I
 7 think -- I think this is what you have testified to or
 8 the summation of your testimony -- that your wife would
 9 be of the opinion that what you did was not manipulation
 10 and seduction, correct?
 11 MS. NIX: Objection; form.
 12 THE WITNESS: I don't -- I still don't --
 13 Q. (BY MR. CHAPMAN) Is that something I'm going
 14 to have to ask her?
 15 A. Yes.
 16 Q. Okay. All right. Now, on to -- I'm going to
 17 scroll down through this. This is your First Amended
 18 Petition, Exhibit 3, that I'm scrolling through. You're
 19 still asking for in your First Amended Petition \$335,000
 20 in defamation damages plus \$500,000 in pain and
 21 suffering damages. Do you see that?
 22 A. Yes.
 23 Q. Had you made any damage calculations between
 24 the time you filed your first petition and this amended
 25 petition?

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1 A. No.

2 Q. Okay. The \$335,000 figure for defamation, you

3 agree with me that's a pretty big chunk of money,

4 correct?

5 A. Yes.

6 Q. Okay. And that's associated with what you

7 would consider special damages associated with having

8 the kind of things said about you that you believe were

9 not to be true, correct?

10 MS. NIX: Objection; form.

11 THE WITNESS: I don't know.

12 Q. (BY MR. CHAPMAN) Okay. Well, it's related to

13 defamation. You're asking for \$335,000 related to

14 defamation.

15 MS. NIX: Objection; form.

16 Q. (BY MR. CHAPMAN) Correct?

17 A. No, that's not correct. It reads actual

18 damages and special damages.

19 Q. Okay. Here we go.

20 A. Pain and suffering.

21 Q. Actual damages and special damages from the

22 Defendants in an amount of no less than \$335,000

23 associated with Plaintiffs' claim of defamation. Do you

24 see that? It's number -- letter A on the amended

25 petition.

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1 A. Yes, I do.

2 Q. So you are asking for damages associated with

3 defamation in the amount of \$335,000 at least?

4 MS. NIX: Did you say are or were,

5 Mr. Chapman?

6 THE WITNESS: I don't understand.

7 Q. (BY MR. CHAPMAN) You were at the time you

8 filed this amended petition.

9 A. Yes.

10 Q. Is that large figure associated with defamation

11 because having this kind of thing said about you could

12 be severely damaging and cause special damages? That

13 was your contention at the time, correct?

14 A. I don't know.

15 Q. You don't know? Okay. I'll move on. But you

16 believed at the time or at least it was in your petition

17 that you agreed with that you had suffered special

18 damages related to defamation on this subject, correct?

19 A. Yes.

20 Q. And your lawyers had included special damages

21 in their petition, correct?

22 A. Yes.

23 Q. I'm going to scroll on through again, and here

24 we are. This is your affidavit that was attached to

25 your amended petition I've attached as Exhibit 3. Do

Page 144

1 you see that?

2 A. Yes.

3 Q. And the first part says -- it's very similar to

4 the other one. It says you have read the First Amended

5 Original Petition and Application for Temporary

6 Restraining Order and you have read the response to the

7 motion to dismiss per CPRP chapter 27 and motion to

8 transfer venue. Do you see that language?

9 A. Yes.

10 Q. And you're saying that the facts therein were

11 within your personal knowledge -- excuse me -- and were

12 true and correct. Do you see that?

13 A. Yes.

14 Q. Is there anything about that that's inaccurate

15 as we are sitting here today?

16 A. No.

17 Q. I'm going to scroll down. I'm sorry. I'm

18 looking for some certain language that should be jumping

19 off the page at me and it's not. Give me one second.

20 Here we go. All right.

21 In the second paragraph of this affidavit

22 that I have now gotten the right part of it pulled up on

23 the screen, the first sentence says, I, Richard Galvan,

24 hereby state Blaine Crews did the following on

25 October 21st, 2018, at 7:01. Do you see that language?

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1 A. Yes.

2 Q. It says, I called Blaine Crews in response to

3 Blaine Crews's repeated contacts with my wife Sonia

4 Galvan. During the conversation Blaine Crews claimed in

5 2007 that I manipulated and seduced Hannah Crews. Do

6 you see that?

7 A. Yes.

8 Q. Have I read that correctly?

9 A. Yes.

10 Q. The next sentence reads, This is false. Do you

11 see that?

12 A. Yes.

13 Q. What was false in that affidavit? What are you

14 referring to as being false?

15 MS. NIX: Objection; form.

16 MR. CHAPMAN: Basis?

17 THE WITNESS: That I manipulated and

18 seduced Hannah Crews.

19 MS. NIX: And the objection, for

20 specificity, Mr. Chapman, was you asked what was

21 incorrect about that affidavit.

22 MR. CHAPMAN: Oh, thank you. Let me

23 correct that.

24 Q. (BY MR. CHAPMAN) You're saying, Mr. Galvan,

25 this is false refers to manipulation and seduction,

Page 146

1 correct?
 2 A. Yes.
 3 Q. If your lawyers contended on the record in open
 4 court that "this is false" in fact meant that you had
 5 never had any relationship with Hannah Crews of a
 6 romantic or sexual nature, that itself would not be a
 7 true statement about your affidavit, correct?
 8 MS. NIX: Objection; form.
 9 THE WITNESS: I don't have any idea,
 10 unfortunately, of what you're asking me.
 11 Q. (BY MR. CHAPMAN) Okay. Are you aware whether
 12 or not your lawyers used the words "this is false" to
 13 tell a court that you never had any sexual relationship
 14 with Hannah Crews?
 15 A. No.
 16 Q. If they did that, that would be improper,
 17 wouldn't it?
 18 A. I don't know. I don't know.
 19 Q. Well, that's not what you meant by "this is
 20 false" in this affidavit, correct?
 21 MS. NIX: Objection; form. And for
 22 specificity, Mr. Chapman, asking my client what he meant
 23 on something and asking my client what lawyers may have
 24 meant when they did something that he's saying he has no
 25 knowledge of are two different things.

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1 MR. CHAPMAN: Objection to side-bar. Thank
 2 you for the explanation.
 3 Q. (BY MR. CHAPMAN) Mr. Galvan, what you meant
 4 in this affidavit by saying "this is false" is
 5 specifically saying only manipulation and seduction are
 6 false, correct?
 7 A. Correct.
 8 Q. You never intended this affidavit to infer that
 9 you didn't have a sexual -- physical sexual relationship
 10 with Hannah Crews, did you?
 11 MS. NIX: Objection; form to relationship.
 12 Q. (BY MR. CHAPMAN) You didn't intend this
 13 affidavit to be read to say or inferred to say that you
 14 didn't ever have sex with Hannah Crews; is that right?
 15 A. Yes.
 16 Q. If your lawyers said that on your behalf, they
 17 were wrong to say that, weren't they?
 18 MS. NIX: Objection; form.
 19 THE WITNESS: I don't know what -- I don't
 20 know. I can't answer that question for them.
 21 Q. (BY MR. CHAPMAN) Did you write this affidavit
 22 yourself or was this typed in a lawyer's office?
 23 MS. NIX: Objection; form. It could be
 24 both.
 25 THE WITNESS: Yeah.

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1 Q. (BY MR. CHAPMAN) Okay. Did you write out the
 2 language, the exact language, of this affidavit
 3 yourself, Mr. Galvan?
 4 A. No.
 5 Q. Was it prepared at your lawyer's office?
 6 A. Yes.
 7 Q. And then you signed it agreeing to it, correct?
 8 A. Yes.
 9 Q. And when you signed it agreeing to it, you were
 10 saying this is false about manipulation and seduction,
 11 correct?
 12 A. Correct.
 13 Q. All right. I'm going to move on to an
 14 Exhibit 4. Let me get that pulled up.
 15 All right. Mr. Galvan, can you tell me
 16 what document you see in front of you?
 17 A. Affidavit of Hannah Crews in Support of
 18 Defendants' Motion to Dismiss.
 19 Q. You've seen this affidavit before, correct?
 20 A. Yes.
 21 Q. And you know that this is what we presented as
 22 Hannah Crews's account of what happened between you and
 23 her, correct?
 24 A. Yes.
 25 Q. Mr. Galvan, I have received some discovery

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1 responses from you as of yesterday addressing your
 2 contentions about things that are in this affidavit, and
 3 we'll go over that in minute. But what I want to ask
 4 you is as follows: If you did not agree with the things
 5 that Hannah Crews was saying in this affidavit, why did
 6 you not file a counteraffidavit making those contentions
 7 known with the court?
 8 A. I don't know, sir. I -- I don't know.
 9 Q. After you signed this affidavit on February 8th
 10 relating to the first amended petition, you would agree
 11 with me you didn't sign any other sworn statements in
 12 this case, correct?
 13 A. Correct.
 14 MS. NIX: Objection; form. I think the
 15 motion to nonsuit may have been sworn to but I'm not
 16 positive. So object; form.
 17 Q. (BY MR. CHAPMAN) You never -- let me clarify.
 18 You never signed any sworn affidavit testimony, correct,
 19 after this February 8th affidavit attached to the first
 20 amended petition?
 21 A. Correct.
 22 Q. You didn't challenge Hannah Crews's account of
 23 what happened between you and her prior to the motion to
 24 dismiss being heard by the trial court, did you?
 25 A. I don't know what you mean by challenge, but --

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1 I don't understand.

2 Q. Okay. You didn't file a sworn statement

3 telling the court that some of this affidavit you didn't

4 agree with, did you?

5 A. No.

6 Q. You didn't try to show up and appear and give

7 live testimony telling the court that you didn't agree

8 with what Hannah Crews said about this encounter or your

9 interactions with each other, did you?

10 A. No.

11 Q. You didn't attempt to file any new affidavit

12 evidence or other evidence at the Court of Appeals

13 level, did you?

14 A. No. No.

15 Q. And it seems then the first time that we have a

16 disagreement that you have submitted to me with respect

17 to Hannah Crews's affidavit is in the discovery

18 responses that your lawyer sent me yesterday; is that

19 correct?

20 A. That's correct.

21 Q. Is there any -- is there any particular reason

22 that you know of that you waited two years -- well, a

23 year and a half at least into this litigation before

24 challenging this affidavit?

25 A. I have a new attorney, new lawyer.

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1 Q. Let's go through your comments on the Hannah

2 Crews affidavit. Paragraph one and two. I take it you

3 don't have any issue with those basic statements.

4 A. That's correct.

5 Q. Let me do one thing here before I get too off

6 track. I'm trying to keep my notes clean for the court

7 reporter on the numbers of the exhibits. Okay.

8 Paragraph three. I'm referring to

9 discovery. You recall -- I think you should recall

10 anyways -- strike that.

11 You recall the statements that you just --

12 you just verified yesterday that were in your

13 supplemental interrogatories, correct?

14 A. Correct.

15 Q. Okay. Looking at Hannah Crews's affidavit, it

16 says, I met both Sonia and Richard Galvan prior to my

17 teenage years. Is there anything incorrect about that

18 statement?

19 A. No.

20 Q. Okay. They were part of your church, North Way

21 Bible Church. Anything incorrect about that?

22 A. No.

23 Q. You're telling me -- I think in your discovery

24 responses you say, I sat under their -- this is your

25 response to me yesterday that I'm reading from, and you

Page 152

1 say the statement, I sat under their leadership and

2 mentorship as a regular group youth member and attendee.

3 You're telling me that's not true?

4 A. That's correct.

5 Q. Are you saying that -- are you saying that

6 Hannah didn't go to regular youth group meetings?

7 A. No.

8 Q. Are you saying that you didn't -- she didn't

9 sit under your leadership? Is that what you're -- is

10 that the part you're saying is untrue?

11 A. That's correct.

12 Q. And that's because you weren't the youth

13 minister at that church, correct?

14 A. Right.

15 Q. All the while -- at the end of paragraph three,

16 all the while going on mission trips with them and even

17 babysitting their children. You don't have any

18 objection to those statements, correct?

19 A. No.

20 Q. And the next statement, Our families were also

21 close friends. We spent much time together outside of

22 church activities. You don't have any disagreement with

23 that statement, correct?

24 A. No. Much time? I'm not sure.

25 Q. You spent time together outside of church with

Page 153

1 Hannah Linn's family, correct?

2 A. We did. We spent some time outside.

3 Q. Yeah. Okay.

4 A. Not much.

5 Q. Okay. Well, that's not something you chose to

6 challenge in your discovery responses as of yesterday,

7 correct?

8 A. That's correct.

9 Q. In paragraph four -- regarding paragraph four,

10 take a second to look at that. I'm going to pull it up

11 so we can see it at the bottom of page one and top of

12 page two. Rather than read the whole paragraph, I'll

13 let you take a look at it right quick. Let me know when

14 you're ready.

15 A. I'm ready.

16 Q. Okay. Your discovery responses regarding that

17 paragraph say that you never offered Hannah Crews a job

18 at Orbit Broadband and she never worked at Orbit

19 Broadband, correct?

20 A. That's correct.

21 Q. Did she work for any other of your companies?

22 A. No.

23 Q. You say, She would stop in after school and

24 occasionally answer the phones at the front desk; is

25 that correct?

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1 A. That's correct.
 2 Q. You didn't pay her for that in any way?
 3 A. No.
 4 Q. She didn't have any certain time that she
 5 needed to be there?
 6 A. No.
 7 Q. She didn't have any set schedule?
 8 A. No.
 9 Q. She wasn't a contractor to help answer phones
 10 in any capacity?
 11 A. No.
 12 Q. That's the -- that's the only objection you
 13 have in your discovery responses to paragraph four,
 14 correct?
 15 A. That's --
 16 Q. Let me pull that up so I don't try to -- I
 17 don't want you to think I'm --
 18 A. I'm sorry.
 19 Q. Yeah, that's fine. Let me show you. Give me
 20 one second. We'll go back and forth between these.
 21 This will be Exhibit 5. This is your supplemental
 22 discovery responses from yesterday. I'll show you the
 23 first page. Do you recognize those?
 24 A. Yes, I do.
 25 Q. Okay. All right. On Exhibit 5 now we're going

Page 155

1 to turn to this stuff about Hannah's affidavit. Okay.
 2 Your objection -- your only objections to Hannah's
 3 affidavit in paragraph four is that you didn't -- you
 4 didn't employ her and she would just stop in
 5 occasionally to answer phones, right? Do you see that
 6 in the middle there in paragraph four? That's your
 7 statement?
 8 A. I never offered Hannah Crews a job at Orbit
 9 Broadband. She never worked at Orbit Broadband. So no.
 10 Q. Okay.
 11 A. Yeah, I see that.
 12 Q. You don't have any other -- okay. You don't
 13 have any other objections then to anything else in
 14 paragraph four other than what you put there yesterday;
 15 is that fair?
 16 A. No.
 17 Q. Okay. Why is that not fair?
 18 A. Can you go back to the --
 19 Q. Sure. There's paragraph four of the affidavit.
 20 A. I was reading. I agreed and my parents agreed
 21 thinking the distraction would be good for me as well as
 22 the Godly mentorship and counsel I would be receiving
 23 from my youth pastor, Richard Galvan, as I worked
 24 through my emotions. I don't -- it's all hogwash.
 25 Q. Okay. So you're saying the bottom part of

Page 156

1 paragraph four is untrue as well?
 2 A. That's correct.
 3 Q. Is there any reason you didn't state that that
 4 was untrue in the discovery responses you served on me
 5 yesterday?
 6 A. No, I don't.
 7 Q. Have you looked at that since you verified your
 8 supplemental discovery response and decided that that
 9 part is untrue now and it wasn't then? Strike that.
 10 Let me ask you a question, Mr. Galvan.
 11 A. No, I'm just reading this and going through it,
 12 and I don't know. Maybe I missed it because it was on
 13 the second page and maybe I just went from the end of
 14 there to five. I don't know. I don't have a good
 15 answer for you, but I --
 16 Q. As we sit here today at your deposition is that
 17 something you just think you left out as far as saying
 18 that that was not accurate?
 19 A. Yes.
 20 Q. Okay. Your discovery responses, supplemental
 21 discovery responses -- and I'm going to toggle back and
 22 forth to this next exhibit. Your supplemental responses
 23 say that paragraphs five, six, seven and eight are
 24 untrue in their entirety. Do you see that language that
 25 you put in there?

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1 A. Yes.
 2 Q. You're telling me in the deposition today that
 3 you wouldn't have any -- you didn't have any discussions
 4 with Hannah about her ex-boyfriend and her relationship
 5 or breakup with her ex-boyfriend?
 6 A. That's correct.
 7 Q. And you didn't ever call her back to your
 8 office?
 9 A. No.
 10 Q. Did she stay out front answering phones the
 11 whole time?
 12 MS. NIX: Objection; form.
 13 THE WITNESS: She wasn't an employee.
 14 Q. (BY MR. CHAPMAN) Well, when she came to your
 15 office to answer phones, did she just stay out the front
 16 and answer phones --
 17 MS. NIX: Objection; form.
 18 Q. (BY MR. CHAPMAN) -- or wherever the phone desk
 19 was?
 20 MS. NIX: Objection; form.
 21 THE WITNESS: When I -- when I was at the
 22 office I was busy working, so I didn't pay attention.
 23 Q. (BY MR. CHAPMAN) You don't know where she
 24 went in your office then?
 25 A. She never came to answer phones. That's for

Page 158

1 sure.

2 Q. Okay. You never talked to her about physical

3 affection that she had with her ex-boyfriend?

4 A. No.

5 Q. And you never told her that having sex with you

6 would be the best way to get over her boyfriend?

7 A. No.

8 Q. That categorically did not happen?

9 A. Absolutely not.

10 Q. Moving on to paragraph seven. Your testimony

11 here today is that Hannah never told you that she was a

12 virgin?

13 A. That's correct.

14 Q. You had no knowledge one way or the other,

15 correct?

16 A. That's correct.

17 Q. And you never told her that your wife Sonia

18 would be okay with this because it was to help her out?

19 A. Oh, my gosh, no.

20 Q. Okay. Did you ever kiss her at your office?

21 I'm in paragraph eight.

22 A. I'm reading. I'm reading it now.

23 Q. Sure.

24 A. No, I didn't kiss her that day.

25 Q. Okay. So according to your discovery responses

Page 159

1 from yesterday, all the account of how -- of things

2 between you and Hannah in six, seven and eight of her

3 affidavit are untrue?

4 A. Correct.

5 Q. Why did you not tell either the trial court in

6 Cameron County or the 13th Court of Appeals that those

7 statements were untrue?

8 A. I don't know.

9 MS. NIX: Objection; form.

10 MR. CHAPMAN: What's the basis for that?

11 MS. NIX: Legal opinion. That's exactly

12 what he was saying in his original petition and first

13 amended petition.

14 Q. (BY MR. CHAPMAN) Mr. Galvan, you would agree

15 with me that you could have put in either one of your

16 petitions in this case what you have testified here to

17 today that you had a sexual encounter with Hannah Crews

18 but you did not manipulate or seduce her? You could

19 have put that in there, correct?

20 MS. NIX: Objection; form.

21 THE WITNESS: I don't know.

22 Q. (BY MR. CHAPMAN) Nothing stopped you from

23 indicating to the court that you had had a sexual

24 encounter with Hannah Crews and that your claim of

25 defamation was only based on the words manipulation and

Page 160

1 seduction. There's nothing that would have prevented

2 you from adding that to your petition, correct?

3 A. I don't know.

4 Q. All right. Moving on to paragraph nine of this

5 affidavit of Hannah Crews, scrolling up, it starts out

6 with, Finally after weeks and weeks of conversation and

7 manipulation and coercion, convincing in Mr. Galvan's

8 office -- I take it you object to that as being untrue?

9 A. Correct.

10 Q. It says, She agreed to meet you at the

11 La Quinta Hotel in Mercedes, Texas. That part you would

12 agree with?

13 A. Correct.

14 Q. I'm going to pull your statements up about --

15 go ahead and take a gander at paragraph nine, and we'll

16 ask some questions, some more questions about it. Let

17 me know when you're ready.

18 A. Okay. I'm ready.

19 Q. Okay. And this is your statement about

20 paragraph nine. You say that, There are no weeks of

21 conversations or manipulation nor coercion in my office.

22 Do you see that statement?

23 A. Yes.

24 Q. And you've objected to -- you objected and

25 stated as untrue today Hannah's accounts in the

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1 preceding four paragraphs of her affidavit about how

2 this came to be preceding the incident at the La Quinta,

3 correct?

4 A. Yes.

5 Q. If Hannah's version of that is untrue, as

6 you've testified here today, what led up to her meeting

7 you at the La Quinta, at the La Quinta Hotel?

8 A. It was the time that prior to that was our

9 meeting. She had come to the office one time. I was

10 there. She had wanted to have -- wanted to kiss me,

11 wanted to hug me, wanted to talk about a dragon of some

12 sort in her, inside of her that she let loose when she

13 was younger, and after multiple attempts we agreed to go

14 to La Quinta.

15 Q. How many times did you talk or interact with

16 Hannah Crews, Hannah Linn then -- excuse me -- preceding

17 this meet-up at the La Quinta? How many times -- how

18 long did this go on that y'all were talking?

19 MS. NIX: Objection; form. Answer.

20 THE WITNESS: She made three overtures.

21 Q. (BY MR. CHAPMAN) Where she tried -- what did

22 she do in those overtures?

23 A. The first time that, as I stated, she came --

24 she came into the office, she approached me telling me

25 that she needed to satisfy a need, that there was a

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1 dragon inside of her, some dragon that she had let out
 2 or let loose when she was younger and that she needed to
 3 have something inside of her.
 4 Q. Do you remember when this first occasion was?
 5 A. It was prior to us going to La Quinta.
 6 Q. Well, was it within a month before you went to
 7 La Quinta?
 8 A. It could have been a month. It could have been
 9 a couple of weeks.
 10 Q. Was it over a month? Could it have been two
 11 months before the La Quinta?
 12 A. No.
 13 Q. So sometime one month or sooner, correct?
 14 A. Right.
 15 Q. And then you said there were three times. What
 16 happened in the second time?
 17 A. The second time I'm sitting at my desk. I'm
 18 working, and she walks in and she just gets closer and
 19 closer until her face is -- her cheek is right next to
 20 mine. And I backed up and I told her, I'm like, What
 21 are you doing? And then she -- she backed off. I think
 22 she left. She left at that time. I told her she needed
 23 to leave, I believe.
 24 Q. Did she say anything to you that time?
 25 A. No, she didn't say anything to me.

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1 Q. And you told her she needed to leave?
 2 A. Yeah. Yes, I did.
 3 Q. And how far before the -- how long before the
 4 La Quinta meet-up was that?
 5 A. Again, within the two weeks or so.
 6 Q. And then there was the third time you
 7 referenced. What happened the third time?
 8 A. The third time she came up. She said she
 9 needed a hug. She came up, gave me a hug. She leaned
 10 in to me and kissed me on the mouth.
 11 Q. Okay. Did you say anything to her before she
 12 leaned in and kissed you on the mouth?
 13 A. No.
 14 Q. Did you have any conversation with her
 15 whatsoever?
 16 A. Before?
 17 Q. Yes.
 18 A. No.
 19 Q. Where did this occur?
 20 A. There in the office.
 21 Q. Where in the office?
 22 A. In my office.
 23 Q. Where did the second advance occur?
 24 A. I don't recall. I'm not sure.
 25 Q. Was it at your office?

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1 A. It was at -- like in my office where I was
 2 working? Yes, it was in my office where I was working,
 3 where I was working.
 4 Q. And then the first time this happened -- you
 5 said there were three times. The first one, was that
 6 also in your office?
 7 A. The first one, I think, was in maybe the middle
 8 office. I don't recall.
 9 Q. Okay.
 10 A. Maybe the front. I'm not sure.
 11 Q. Was there anybody around to see any of these
 12 interactions that you just described, any of these three
 13 interactions?
 14 A. No.
 15 Q. Prior to the three attempts that you've
 16 described had you had any conversations with Hannah Linn
 17 about anything romantic or sexual?
 18 A. No.
 19 Q. Ever?
 20 A. No.
 21 Q. Had you done anything that you would believe
 22 constituted flirting with her?
 23 A. No.
 24 Q. Ever?
 25 A. No.

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1 Q. Let's go back to that third time. She leaned
 2 in and kissed you. What did you do?
 3 A. I backed up. I said, What are you doing? I
 4 told her, I said, Why are you doing this? And she just
 5 turned around and she left.
 6 Q. She left or she laughed?
 7 A. Left.
 8 Q. Left your office?
 9 A. Departed.
 10 Q. How did the conversation between you and her
 11 about meeting at the La Quinta start up?
 12 A. That's the last time that she had come, and she
 13 came up to me. She kissed me. We kissed. I had a
 14 small couch, I believe, or chair. I don't remember.
 15 She pushed me on the -- back onto the couch. She got on
 16 top of me and, she said, What if somebody comes in?
 17 Let's go somewhere. So we went to La Quinta.
 18 Q. Did you go to La Quinta that same day?
 19 A. I don't -- I believe so.
 20 Q. What time of the day -- what time in the day
 21 did it happen that she pushed you on the couch?
 22 A. Mid-afternoon, I believe.
 23 Q. And how long was it before that you -- before
 24 you were going to the La Quinta?
 25 A. An hour, 30 minutes. I'm not sure. Maybe

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1 less.
 2 Q. So --
 3 A. I went and --
 4 Q. Go ahead. I'm sorry.
 5 A. I went, and she met me there.
 6 Q. Okay. So she pushed you on the couch and got
 7 on top of you in your office and then suggested to you
 8 that you both go somewhere private away from the office?
 9 Is that what you've just testified to?
 10 A. Yes, that's correct.
 11 Q. And in response to that did you then call the
 12 La Quinta to get a room?
 13 A. No, I think I just went over there.
 14 Q. You didn't -- did you get on the internet and
 15 make a reservation?
 16 A. No.
 17 Q. Okay. How far is the La Quinta from your
 18 office?
 19 A. A couple or three or four miles maybe. Maybe
 20 so. A couple or three miles.
 21 Q. Ten-minute drive maybe then?
 22 A. Or so.
 23 Q. Okay. Did you get to the La Quinta first or
 24 did she?
 25 A. I believe I did.

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1 Q. And you went to the desk and got a -- got a
 2 room?
 3 A. That's correct.
 4 Q. What floor was it on?
 5 A. I don't remember.
 6 Q. You don't remember whether you had to go up
 7 stairs or an elevator?
 8 A. I don't.
 9 Q. How many floors does that La Quinta have?
 10 A. I have no idea.
 11 Q. More than three?
 12 A. I don't know.
 13 Q. Have you ever stayed there before?
 14 A. No.
 15 Q. Had you ever -- have you ever stayed there
 16 since?
 17 A. No.
 18 Q. How did you pay for the room?
 19 A. I don't remember.
 20 Q. Did you use cash?
 21 A. I don't remember.
 22 Q. How long after you had arrived at the La Quinta
 23 was it before she made it to the La Quinta?
 24 A. Shortly. I don't know exactly, but she met me
 25 there.

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1 Q. Did you go up and open up the room before she
 2 got there?
 3 A. No, we went up together. We went to the room
 4 together.
 5 Q. So you hadn't been in the room before she got
 6 there?
 7 A. That's correct.
 8 Q. I take it the room was only in your name.
 9 A. That's correct.
 10 Q. Did you use your given name to rent the room at
 11 La Quinta?
 12 A. I don't remember.
 13 Q. I'm going to pull up -- if you look on this
 14 paragraph nine response you served on us yesterday, you
 15 say there were no sexual acts, plural. There was only
 16 one act of sexual intercourse. Do you see that?
 17 A. I do.
 18 Q. Okay. The next sentence says, She was most
 19 emphatically not a virgin. Do you see that?
 20 A. Yes.
 21 Q. What is your basis for that statement?
 22 A. I don't know. I mean, I believed that based
 23 off of -- she's not. She was not a virgin.
 24 Q. Okay. I'm going to -- you gave a sworn
 25 statement yesterday that contains the phrase, She was

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1 most emphatically not a virgin, Mr. Galvan. What facts
 2 that you knew of yesterday when you made that statement
 3 support that statement?
 4 A. What facts do I have? She didn't have any fear
 5 or awkwardness and she was experienced.
 6 Q. How do you know she was experienced?
 7 A. She acted that way.
 8 Q. Is that your opinion then? Not a factual
 9 statement, correct?
 10 A. Correct.
 11 Q. You don't have any facts to support the
 12 statement that she was most emphatically not a virgin,
 13 correct?
 14 A. Say that again.
 15 Q. You don't have any facts behind the statement
 16 that she was most emphatically not a virgin. That's
 17 your opinion; is that correct?
 18 A. Other than the way that she acted and showed
 19 herself, how she, you know, talked about the dragon, I
 20 think I'd assume that that was her not being a virgin
 21 and had woken up something inside of her when she was
 22 younger. How she could just come on and be without any
 23 reserve led me to believe that she was not a virgin.
 24 Q. Okay. So that's your -- that's your assumption
 25 and your belief then, correct?

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1 A. That is correct.
 2 Q. You're not a doctor. You don't -- you don't
 3 have any expertise in determining whether someone is a
 4 virgin or not, correct?
 5 A. It is my opinion.
 6 Q. Well, answer the question, sir.
 7 A. That is correct.
 8 Q. You don't have any particular expertise in
 9 being able to determine whether somebody is a virgin or
 10 not?
 11 A. I do not.
 12 Q. And you don't know whether she went back to a
 13 high school volleyball game that day or not, do you?
 14 A. I do not.
 15 Q. Moving on, I'm going to get back to paragraph
 16 ten of the affidavit. Go ahead and give that a read,
 17 and let me know when you're ready.
 18 A. Okay.
 19 Q. Okay. Do you agree that weeks later Hannah
 20 Linn's mother found about what had happened?
 21 A. I'm not sure how -- yes, I believe, yes, that's
 22 correct.
 23 Q. Did you have any conversations with her mother
 24 about what had happened?
 25 A. Yes.

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1 Q. What did you tell her mother, Starla?
 2 A. I responded to some questions that she had
 3 asked me.
 4 Q. Did you tell her you had had sex with Hannah?
 5 A. Yes. Only once.
 6 Q. You don't believe -- based on your discovery
 7 responses, you don't believe your wife Sonia had any
 8 conversation about you sending mixed signals with
 9 Hannah?
 10 A. That's correct.
 11 Q. Do you think that Hannah had a crush on you?
 12 A. I don't know.
 13 Q. But you never flirted with her or suggested
 14 anything romantic until she suggested the same to you,
 15 correct?
 16 MS. NIX: Objection; form. Facts not in
 17 evidence that he made any suggestion.
 18 THE WITNESS: I don't -- I don't -- I don't
 19 know. I don't know how to answer that question. I'm
 20 sorry.
 21 Q. (BY MR. CHAPMAN) Well, going back to when you
 22 were in your office and you testified that Hannah pushed
 23 you on the couch and jumped on top of you and then said
 24 that you should go somewhere more private, who made the
 25 suggestion of the hotel? Was that you or was that her?

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1 A. That was her.
 2 Q. What did she say?
 3 A. What if somebody -- what is somebody comes in?
 4 We should go somewhere else.
 5 Q. Okay. She said you should go somewhere else.
 6 Who came up with the idea of the hotel? Was that you?
 7 A. It was her.
 8 Q. What did she say?
 9 A. Let's go to a hotel.
 10 Q. So Hannah Linn asked you to go to a hotel in
 11 August of 2007?
 12 A. That's correct.
 13 Q. And what was your response?
 14 A. We went.
 15 Q. What was your response to her statement?
 16 A. Okay.
 17 Q. That's it? Just okay?
 18 A. That's it.
 19 Q. Did you have any more discussion than that
 20 before you left to go to the La Quinta?
 21 A. No.
 22 Q. When you got to the hotel room did you have any
 23 discussions with Hannah?
 24 A. No.
 25 Q. Did she say anything to you?

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1 A. I don't recall.
 2 Q. Do you recall if you said anything to her?
 3 A. No.
 4 Q. Did you have any other meet-ups after that
 5 meet-up at the La Quinta with Hannah?
 6 A. No.
 7 Q. Did you have any regular contact with Hannah
 8 after that?
 9 A. Regular? No.
 10 Q. Did you participate with her in church
 11 activities after that?
 12 A. Yes.
 13 Q. What activities?
 14 A. Well, we went to church on Sundays, and I don't
 15 recall what activities it might have been. Typically
 16 during December there's like Christmas stuff. I don't
 17 recall all the activities and the definite attendance
 18 when she was there, but I do know that we did go on a
 19 church trip, a mission trip, in June of 2008 which she
 20 did go on as well.
 21 Q. Were you ever alone with her during that time?
 22 A. No.
 23 Q. Did you make any attempt to -- ever make any
 24 attempt to talk to her about this La Quinta incident
 25 after you left the La Quinta?

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1 A. No.

2 Q. Did you text her about the La Quinta incident

3 after you left the La Quinta?

4 A. No.

5 Q. Not at all?

6 A. No.

7 Q. So you left the La Quinta and you never had any

8 communications with her after that at all about that

9 incident?

10 A. That's correct.

11 Q. Did you ever come see her when she was a

12 freshman at Trinity in San Antonio?

13 A. No.

14 Q. With respect to paragraph twelve, it is your

15 contention as we sit here today that everything in that

16 paragraph is false?

17 A. That's correct.

18 Q. So you never even came to San Antonio to see

19 her at all?

20 A. That's correct.

21 Q. Never bought her roses?

22 A. That's correct.

23 Q. Did you ever give her any money after the

24 La Quinta incident for any reason?

25 A. No.

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1 Q. And it's your testimony as we sit here today

2 that the idea to go somewhere private was the idea of

3 17-year-old Hannah Linn who was at your office answering

4 phones voluntarily for no pay?

5 A. That's correct.

6 Q. Have you ever had any other similar incidents

7 with young women at the church?

8 A. No.

9 Q. Or anywhere else?

10 A. No.

11 Q. Are you aware of any complaints about you being

12 inappropriate with women?

13 A. No.

14 Q. So it's your testimony today that you were the

15 one that was seduced and you were seduced by Hannah Linn

16 after saying no three times and the fourth time she

17 jumped on top of you and said go somewhere more private

18 and then said go to a hotel and you said okay?

19 MS. NIX: Objection; form. I believe it

20 was --

21 Q. (BY MR. CHAPMAN) Is that right?

22 MS. NIX: -- it was the third time where

23 there was a jumping on.

24 THE WITNESS: There were three time I said

25 no and the fourth time then, yes, that is correct.

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1 Q. (BY MR. CHAPMAN) Okay. Going back to

2 February of 2018 after you had filed this lawsuit and

3 you were aware of Hannah Linn -- Hannah Crews's

4 affidavit that we just went over, did you not think it

5 was necessary for you to file a version of -- your

6 version of the story with the court?

7 MS. NIX: Objection; form.

8 THE WITNESS: I don't know.

9 Q. (BY MR. CHAPMAN) You would agree with me that

10 if Hannah had lied about all the things you just said

11 she lied about, those are hurtful and serious things to

12 lie about, correct?

13 A. That's correct.

14 Q. And that's -- if she lied about all those

15 things, that's why you filed this lawsuit, correct?

16 A. That's correct.

17 Q. Why then didn't you apprise the court of your

18 version of what actually did happen?

19 A. I don't know.

20 Q. Why didn't you try to tell the appeals court

21 what actually did happen?

22 A. I don't know.

23 Q. Did you talk about -- back at the time in 2007

24 did you talk about Hannah seducing you to anyone?

25 A. No.

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1 Q. Did you tell your wife about this incident or

2 the incidents leading up to it back in 2007?

3 A. No.

4 Q. When did you first tell her?

5 A. Say that again? Maybe I didn't understand the

6 question.

7 Q. When did you first tell Sonia about what had

8 happened between you and Hannah?

9 A. I told Sonia what had happened between Hannah

10 and I in 2007.

11 Q. So you did tell Sonia in 2007?

12 A. Yes, I did.

13 Q. Okay. Did y'all undertake to go to any

14 counseling or anything like that about it?

15 A. Not at the time.

16 Q. Do you know if Sonia talked to either one of

17 Hannah's parents about it back in the 2007 time frame?

18 A. No, I don't.

19 Q. Okay. You understand that after I brought this

20 motion to dismiss under the Anti-SLAPP statute that the

21 trial court denied that motion, denied my motion to

22 dismiss. You understand that, correct?

23 A. I don't know those things. I'm not a --

24 Q. Well, you understand I took an appeal to the

25 13th Court of Appeals on behalf of my clients, Blaine

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1 and Hannah Crews, relating to the Anti-SLAPP motion.
 2 You understand that much, don't you?
 3 MS. NIX: Objection; form.
 4 THE WITNESS: Again, I don't -- I don't
 5 know. I don't know. I don't know what that is.
 6 Q. (BY MR. CHAPMAN) You know this case went to
 7 the Court of Appeals, don't you?
 8 A. Oh, yes.
 9 Q. And you knew that at the time when it went that
 10 it was going to be appealed, correct?
 11 A. That's correct.
 12 Q. And you participated actively in asking your
 13 lawyers to challenge the appeal, correct?
 14 A. Yes.
 15 Q. And did you review the documents that were
 16 filed in the appeal?
 17 A. I don't recall.
 18 Q. I'm going to pull up what will be marked as
 19 Exhibit 6. Let me write that down. Excuse me.
 20 Exhibit 5. Tell me what the name of that document is.
 21 A. Blaine Crews and Hannah Crews --
 22 Q. It's right there.
 23 A. Appellees' -- appeals -- Appellees' Brief.
 24 Q. That's difficult to get around, I know. It's
 25 Appellees' Brief.

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1 A. Okay.
 2 Q. And that was filed by your attorneys that were
 3 acting on behalf of you and Sonia, correct?
 4 A. Yes, that's correct.
 5 Q. And by that time you had Travis Bence, Jim
 6 Young and another attorney named Lena Chaisson-Munoz,
 7 correct?
 8 A. That's correct.
 9 Q. Did you make an effort to hire Lena
 10 Chaisson-Munoz or was that done on Bence's
 11 recommendation?
 12 A. On Bence's recommendation.
 13 Q. Okay. Did you ask Bence to bring in Mr. Young
 14 or was that done on his recommendation?
 15 A. That was on Bence's recommendation.
 16 Q. Okay. Did you talk to any other lawyers about
 17 handing your appeal?
 18 A. No.
 19 Q. Did you read this brief filed in the Court of
 20 Appeals opinion -- Court of Appeals on your behalf
 21 before it was filed?
 22 A. No.
 23 Q. Did you ask to read this brief filed in the
 24 Court of Appeals on your behalf before it was filed?
 25 A. No.

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1 Q. Up to the time your appeal -- this thing went
 2 to the Court of Appeals, how much money had you paid
 3 your three lawyers, Bence, Young and Chaisson-Munoz?
 4 MS. NIX: Objection; form.
 5 THE WITNESS: I don't know. I'm not sure.
 6 Q. (BY MR. CHAPMAN) Do you have an understanding
 7 of how much you've paid those three lawyers total during
 8 the time they represented you?
 9 A. I don't know.
 10 Q. Is it more than \$10,000?
 11 A. Again, I don't know.
 12 Q. Well, do you have any records to reflect what
 13 you paid your lawyers in this case?
 14 A. For -- I should, yes.
 15 Q. Did they send you fee statements?
 16 A. They told me what their fees were.
 17 Q. What did they tell you about their fees?
 18 MS. NIX: Objection. That's -- don't
 19 answer that.
 20 THE WITNESS: I'm not going to answer that.
 21 Q. (BY MR. CHAPMAN) Okay. Well, you're right.
 22 I don't want anything they told you about the fees.
 23 What I do want to know is what the total amount of fees
 24 incurred by those three were?
 25 A. I will have to try to figure that out.

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1 Q. You don't have any understanding as we sit here
 2 today how much in total you paid those three lawyers to
 3 represent you during the time they represented you?
 4 A. No, I don't.
 5 Q. Did you pay for that from a personal bank
 6 account or business bank account?
 7 A. I don't -- I don't remember.
 8 Q. Did you pay for it or did Sonia pay for it?
 9 A. Our names are on the same checks, our personal.
 10 Q. Have you ever read the brief that your lawyers
 11 filed in the Court of Appeals on your behalf?
 12 A. No.
 13 Q. To this day you've never read it?
 14 A. No.
 15 Q. You sued my clients for over \$835,000. Don't
 16 you think that's something important that you might want
 17 to read?
 18 MS. NIX: Objection; form.
 19 THE WITNESS: No.
 20 Q. (BY MR. CHAPMAN) I'm going to pull up a
 21 document here entitled Second Amended Brief of
 22 Appellants. Do you see that document now?
 23 A. Yes.
 24 Q. That will be Exhibit, 6, Madam Reporter.
 25 Have you ever read this brief filed by

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1 myself on behalf of the Crewses?
 2 A. No.
 3 Q. Was it ever sent to you by your lawyers?
 4 A. I don't believe so.
 5 Q. To this day you've never read it?
 6 A. No.
 7 Q. Do you know if your wife has read either the
 8 appellants' brief or appellees' brief in this case?
 9 A. No.
 10 Q. Hold on one second. I'm going to pull up a
 11 document that will be marked as Exhibit 8.
 12 This is the opinion of the Court of Appeals
 13 in this case, in your case. Have you ever read this
 14 document?
 15 A. No.
 16 Q. This is a 16-page published opinion by the 13th
 17 Court of Appeals authored by the chief justice. You've
 18 never read it at all?
 19 A. No.
 20 Q. Why is that?
 21 A. Because I haven't.
 22 Q. Is it not important to you?
 23 A. I believe, Mr. Chapman, that it's -- I just --
 24 I have not read it.
 25 Q. Well, is it important to you in any way?

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1 A. It's important, but I don't know if I'd even
 2 understand it.
 3 Q. You made no attempt to read it?
 4 A. I have not read it.
 5 Q. Do you have an understanding as we sit here
 6 today that the Court of Appeals adopted the facts laid
 7 out by Hannah Crews in her affidavit as the facts of
 8 this case? Do you understand that as we sit here today?
 9 A. Yes, I do.
 10 Q. Did you get that understanding from one or more
 11 of your lawyers? I don't want to know what they said to
 12 you.
 13 A. I don't know. No, I have no idea.
 14 Q. Did you get that understanding from somewhere
 15 other than your lawyers?
 16 A. I do recall you saying it.
 17 Q. When was that?
 18 A. When we were, I think -- I think on either the
 19 nonsuit or when Travis and Jim got off the case I
 20 thought you brought that up. I'm pretty sure you did.
 21 Q. Okay. Was that the first time you had heard
 22 that?
 23 A. That's correct.
 24 Q. You understand that this 16-page opinion is
 25 published on the court's website, don't you?

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1 A. I do.
 2 Q. Do you understand that it will be bound and put
 3 in a book called either Texas Reporter or Southwest
 4 Reporter, one of the big bound law books that are kept
 5 in law libraries if they keep physical copies? Do you
 6 understand that?
 7 A. I guess so. I do now.
 8 Q. Do you understand that it's an official record
 9 of the Court of Appeals of the State of Texas now?
 10 A. I do now.
 11 Q. Did you understand at the time the opinion was
 12 issued that you had the right to seek an additional
 13 appeal to the Texas Supreme Court?
 14 A. No.
 15 Q. Your testimony here today is that you did not
 16 even understand that you could go to the Texas Supreme
 17 Court after the 13th Court of Appeals issued its
 18 opinion?
 19 A. That's correct.
 20 Q. So I take it then the answer that I -- the
 21 question I was going to ask is why didn't you take this
 22 up to the Supreme Court is -- it's because you didn't
 23 know; is that correct?
 24 MS. NIX: Objection; form.
 25 THE WITNESS: I'm not an attorney. I don't

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1 know steps. I don't know positions. I don't know.
 2 Q. (BY MR. CHAPMAN) Okay. Why didn't you take
 3 this up to the Texas Supreme Court after the Court of
 4 Appeals decided this against you?
 5 MS. NIX: Objection; form.
 6 THE WITNESS: I don't know.
 7 Q. (BY MR. CHAPMAN) Do you understand that this
 8 published opinion is available on several websites that
 9 publish, informally publish, courts' -- opinions of the
 10 various Courts of Appeals in Texas?
 11 MS. NIX: Objection; form. Asked and
 12 answered.
 13 THE WITNESS: Yes, I do.
 14 Q. (BY MR. CHAPMAN) When did you first come to
 15 that understanding?
 16 A. Right now when you just said it.
 17 Q. So before now you didn't have any understanding
 18 that this opinion was published by various websites that
 19 take it upon themselves to list Courts of Appeals'
 20 opinions?
 21 A. No.
 22 MR. CHAPMAN: Okay. All right. Let me
 23 take like a five-minute break, if you don't mind.
 24 (Recess from 3:27 to 3:37.)
 25 MR. CHAPMAN: Let me make a correction to

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1 the exhibits we have been talking about. I was doing
 2 good up through Number 4, which is the Hannah Crews
 3 affidavit. Number 5 is the supplemental discovery, and
 4 I think at one point I made a bad note on that or did
 5 not note that. So that will be Number 5. 6 will be the
 6 Appellees' Brief. 7 is the -- or -- yeah, 7 is the
 7 brief of the appellants, the Crewses. 8 is the opinion.
 8 And I'm about to pull up what I think will be Exhibit
 9 Number 9, which is Mr. Galvan's original interrogatory
 10 responses. Let me get those pulled up.
 11 Q. (BY MR. CHAPMAN) Do you recognize this
 12 document, Mr. Galvan?
 13 A. Yes, sir.
 14 Q. Okay. Is this something you signed and
 15 notarized as being true and correct and within your
 16 personal knowledge?
 17 A. Yes.
 18 Q. Okay. These are your original interrogatory
 19 responses that you signed on or about the -- is that the
 20 20th day of February, 2020, correct?
 21 A. That's correct.
 22 Q. I'm going to have to pull up my questions
 23 because your lawyers also didn't include the question
 24 there. Hold on just one second.
 25 MS. NIX: Prior lawyers.

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1 MR. CHAPMAN: Prior lawyers. Thank you.
 2 Correction noted and appreciated. Let's see here. All
 3 right. This will be -- so we can figure this out, this
 4 will be Number 10.
 5 Q. (BY MR. CHAPMAN) Okay. We're going to go
 6 through -- I'll skip down to number five, which I
 7 believe was a question about youth activity, sports, et
 8 cetera. Do you see that question, Mr. Galvan?
 9 A. Yes, sir.
 10 Q. I'm going to go back to your original responses
 11 on that where it says number five. If you can see my
 12 mouse, it's right here. Do you see that?
 13 A. That's correct.
 14 Q. Yeah. What is Two Words?
 15 A. It's a program that the school district, the
 16 local school district, has for students.
 17 Q. Okay. All right. I've got to go back to --
 18 this is confusing me. I'm going to have to sub out
 19 that. That's not even the right one. I'm going to have
 20 to sub out that. I pulled up the wrong one. Give me
 21 one second. Let me look and make sure I'm in the right
 22 spot now.
 23 Okay. Number eight. Please identify the
 24 date on which you communicated to any third party that
 25 you engaged in sexual relations with Hannah Crews,

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1 formerly known as Hannah Linn. We're going to go back
 2 to your response. It says that you spoke with Oscar
 3 Brooks regarding adultery in 2007 and again in 2018.
 4 Who is Oscar Brooks?
 5 A. He's a member of North Way Bible Church. He's
 6 a missionary.
 7 Q. Okay. What did you tell him?
 8 A. I told him that I committed adultery.
 9 Q. Did you tell him any of the facts and
 10 circumstances around it?
 11 A. I did not.
 12 Q. Did you tell him who it was with?
 13 A. Yes, I did.
 14 Q. Did he know Hannah Linn or now Hannah Crews?
 15 A. Yes, he did.
 16 Q. Other than Starla Linn and Oscar Brooks, have
 17 you talked to anybody else about this incident with
 18 Hannah Crews?
 19 A. At the time, no. Well, my wife.
 20 Q. Okay. Did you tell Mr. Brooks that Hannah
 21 seduced you?
 22 A. No, I just said I committed adultery.
 23 Q. Did you tell her -- did you tell him you went
 24 to a hotel room with her?
 25 A. I did not.

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1 Q. Is Mr. Brooks any type of licensed counselor or
 2 something like that that would have a privilege between
 3 you and him?
 4 A. I don't know.
 5 Q. Do you recall what he said back to you about
 6 your account of this?
 7 A. I do not know. No, I don't recall.
 8 Q. In response to interrogatory ten which I
 9 believe talks about psychiatric treatment and
 10 psychological treatment which you are contending were a
 11 result of the Blaine and Hannah Crews acts in your
 12 lawsuit. In February you responded, I am attending
 13 counseling. Do you see that?
 14 A. I do.
 15 Q. What counseling were you attending in February?
 16 A. February 2019 we did -- we were at a couple's
 17 counseling with a counselor, Sonia and I.
 18 Q. How long did that last?
 19 A. We've still gone off and on.
 20 Q. All right. Hold on a second. I'm trying to
 21 get the questions up so I can read them along with what
 22 your lawyers put.
 23 Okay. I'm going to turn to what are called
 24 requests for admission. You remember answering these,
 25 correct?

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1 A. Yes.

2 Q. Okay. Request for admission number two asks

3 you to admit that you had a sexual intercourse with

4 Hannah Crews, formerly known as Hannah Linn, including

5 vaginal penetration. Do you see that?

6 A. Yes.

7 Q. And your answer to that was that you admitted

8 it, correct?

9 A. Correct.

10 Q. Is that the first time you mentioned that in

11 any pleading or motion or discovery in this lawsuit was

12 in your answer to that admission? Is that correct?

13 A. I believe so.

14 Q. Okay. Response to request for admission number

15 three, Admit that Richard Galvan worked with Defendant

16 Hannah Crews in 2007. Do you see that request?

17 A. Yes.

18 Q. And your response to that in February of 2020

19 was that you admitted it.

20 A. That's not correct.

21 Q. Well, that was your response to the request for

22 admissions that you signed.

23 A. Okay. But it's not correct.

24 Q. Was it not correct at the time that it was --

25 that it was admitted by you in February of 2000-- on

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1 February 21st, 2000-- February 21st, 2020?

2 A. That's correct.

3 Q. So you now acknowledge that the admission that

4 you made on February 21st, 2020, is wrong?

5 A. That is correct.

6 Q. Do you have any explanation as to why you're

7 admitting something -- admitted something in February

8 that you now claim to be false in May?

9 A. No, I don't.

10 Q. Not at all?

11 A. No.

12 Q. Request for admission number four reads, Admit

13 that Richard Galvan was the supervisor of Hannah Crews,

14 formerly known as Hannah Linn, in 2007. And we'll click

15 back over. Your response to number four is that you

16 admitted that. Are you now denying that?

17 A. I am.

18 Q. What is the reason you've changed your answer

19 or are seeking to say that you deny that now when you

20 admitted it in a written discovery response just this

21 past February?

22 A. Why? I just -- I'm denying both of them. I'm

23 denying number three and denying number four.

24 Q. I understand that's what you're saying in your

25 deposition that we're taking today. You admitted to

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1 both of those in February, and I'm going to ask you what

2 happened between February and now with respect to number

3 four to make you change your answer from admit to deny?

4 A. You know, I think I just didn't catch it was

5 wrong.

6 Q. You read the admission requests in February and

7 before you answered them in February 2020, did you not,

8 sir?

9 A. Yes.

10 Q. And you knew those answers would be legally

11 binding upon you?

12 A. I did not know.

13 Q. All right. Going on to number seven, Admit

14 that you paid for a hotel room at the La Quinta in

15 Mercedes, Texas and had sex with Hannah Crews in that

16 room. Do you see that question?

17 A. Yes.

18 Q. And your answer in February of this year is,

19 Unable to admit or deny as no specific records exist.

20 Is that still your answer as we sit here today at your

21 deposition?

22 A. No.

23 Q. The answer is you did rent that room and you

24 did pay for it and you did have sex with her, so that

25 should be an admission, correct?

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1 A. I believe that is -- yes, that's correct.

2 Q. And you knew all the things necessary to admit

3 that number seven back in February and you just refused

4 to do so, correct?

5 A. No, that's not correct.

6 Q. What did you not know in February that you know

7 now with respect --

8 MS. NIX: Objection; form.

9 Q. (BY MR. CHAPMAN) -- with respect to number

10 seven?

11 A. Can you repeat the question, please?

12 Q. Sure. Let's go through this. In February you

13 said you were unable to admit or deny that you booked a

14 room at the La Quinta in Mercedes, Texas and had sex

15 with Hannah Crews in that room. Your answer reads --

16 and I'll ask you to read it for me. Read the answer to

17 number seven that's up on the screen.

18 A. Unable to admit or deny as no specific records

19 exist.

20 Q. In February 20th -- on or about February 20th

21 of 2020, this year, did you know that you had paid for a

22 room at the La Quinta and had sex with Hannah Linn in

23 that room?

24 A. I don't recall.

25 Q. Yes or no, Mr. Galvan. Did you know that you

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1 had paid for that room in La Quinta in February of 2020?
 2 MS. NIX: Objection; form.
 3 Q. (BY MR. CHAPMAN) Yes or no?
 4 A. We've submitted an amendment as you've
 5 requested where I have admitted to paying for a room and
 6 having sex with her.
 7 Q. Objection. Objection to the nonresponsive
 8 answer.
 9 Mr. Galvan, in February 2020 when you
 10 answered this response number seven to my request for
 11 admissions, at that time did you know that you had paid
 12 for a room at the La Quinta and had sex with Hannah Linn
 13 in that room?
 14 A. That's correct. I did.
 15 Q. There wasn't anything preventing you from
 16 admitting the truth to number seven at that time in
 17 February 2020, was there?
 18 MS. NIX: Objection; form.
 19 THE WITNESS: It says unable to admit or
 20 deny.
 21 Q. (BY MR. CHAPMAN) I understand that. There
 22 wasn't anything preventing you from admitting it since
 23 you've admitted it today, correct?
 24 MS. NIX: Objection; form.
 25 THE WITNESS: That I don't know. I don't

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1 know if there was anything permitting. I don't know
 2 what you're alluding to or trying to ask. I can't
 3 answer that question just on the pure basis of how
 4 you're asking it, Mr. Chapman.
 5 Q. (BY MR. CHAPMAN) Objection; nonresponsive.
 6 I'm going to let you have this space in the
 7 record. This is a serious matter. I want to let you
 8 have the space to explain yourself.
 9 A. Okay.
 10 Q. With respect to a response to number --
 11 admission -- request for admission number seven, what
 12 you have changed from unable to admit or deny in
 13 February to today admitting, please list each and every
 14 fact that you have learned since February that enables
 15 you to now admit to that question.
 16 MS. NIX: Objection; form.
 17 THE WITNESS: Can you go back to the
 18 question, please, so I can reread it?
 19 MR. CHAPMAN: Madam Reporter, would you
 20 reread the question, please?
 21 COURT REPORTER: With respect to request
 22 for admission number seven, what you have changed from
 23 unable to admit or deny in February to today admitting,
 24 please list each and every fact that you have learned
 25 since February that enables you to now admit to that

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1 question.
 2 THE WITNESS: I have a new attorney who's
 3 explained that question to me and has --
 4 MS. NIX: Objection; form.
 5 THE WITNESS: That's it.
 6 MS. NIX: Yeah.
 7 THE WITNESS: I have a new attorney that
 8 has explained that question to me.
 9 Q. (BY MR. CHAPMAN) So your testimony here today
 10 is that back in February you didn't understand what was
 11 being asked in request for admission number seven?
 12 MS. NIX: Objection; form.
 13 Q. (BY MR. CHAPMAN) Is that correct?
 14 A. Are you asking about conversation between me
 15 and my attorney?
 16 Q. No, I am not.
 17 A. Okay. So what are you asking me?
 18 Q. I'm asking you in February 2020, with respect
 19 to request for admission number seven that's on the
 20 screen right now, is it your testimony that you did
 21 not -- you were not able to understand what was being
 22 asked by that question in February?
 23 MS. NIX: Objection; form.
 24 THE WITNESS: I followed my attorney's
 25 advice at the time.

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1 Q. (BY MR. CHAPMAN) Objection; nonresponsive.
 2 Okay. Would you read question -- request
 3 for admission number ten to me, please, sir?
 4 A. Admit that Richard Galvan had previously
 5 knowledgeable -- acknowledged to Sonia Galvan that he had
 6 engaged in sexual relations with Hannah Crews, formerly
 7 known as Hannah Linn.
 8 Q. What did you not understand about that question
 9 when it was presented to you in February 2020?
 10 A. I'm sorry. Why do you -- why are you stating
 11 that? Sexual relations?
 12 Q. I'm asking you what did you not understand
 13 about that question back in February?
 14 A. The aspect about sexual relations.
 15 Q. Okay. What did you not understand about sexual
 16 relations?
 17 A. I don't necessarily know what sexual relations
 18 are or what you were asking in regards to what that --
 19 those words are.
 20 Q. You're telling me in February 2020 you didn't
 21 know what sexual relations was sufficient to answer that
 22 question?
 23 A. In 2020?
 24 Q. In February when this was sent over to you.
 25 A. It's kind of vague and it's kind of ambiguous.

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1 I had sex once.
 2 Q. Okay. So if that had read sexual relation,
 3 singular, not sexual relations, plural, you would have
 4 admitted it?
 5 MS. NIX: Objection; form.
 6 THE WITNESS: I did admit to having sex
 7 once. So the answer to your question -- I mean, then
 8 you would have repeated that. That would have been a
 9 repetitive question.
 10 Q. (BY MR. CHAPMAN) Okay. Objection;
 11 nonresponsive.
 12 All right. Request for admission number
 13 eleven. Admit the statement "Blaine Crews then
 14 explained he would have put a bullet in Richard Galvan's
 15 head if Blaine Crews knew Hannah Crews in 2007" is true
 16 and correct and within your personal knowledge. Do you
 17 see that question?
 18 A. I do.
 19 Q. And --
 20 MS. NIX: Objection; form.
 21 Q. (BY MR. CHAPMAN) -- in February of this year
 22 you denied that, correct? Do you see the response?
 23 A. I see the response.
 24 Q. Yesterday in supplemental discovery responses
 25 you changed that deny to an admit. You know that,

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1 correct?
 2 A. That's correct.
 3 Q. What additional information did you have
 4 yesterday to admit to that request for admission that
 5 you did not have in February of 2020?
 6 A. A new attorney.
 7 Q. Anything else?
 8 A. Better explanation by my attorney.
 9 Q. Hold on just one second. We're going to go
 10 back. There we go.
 11 Mr. Galvan what I've done is I've flipped
 12 back to your supplemental discovery responses that were
 13 served yesterday, which was the fifth document that I
 14 asked to be an exhibit in this deposition.
 15 A. Uh-huh.
 16 Q. I'm going to go back to the first page so you
 17 can identify it for me. Do you see that? That's the
 18 responses you made yesterday, correct?
 19 A. Yes.
 20 Q. The answer to interrogatory number 15, State
 21 your net worth as of October 10, 2019, you have now
 22 answered that \$120,000. Do you see that?
 23 A. Yes.
 24 Q. How did you arrive at that figure of your net
 25 worth?

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1 A. Just off the top of my head.
 2 Q. Did you make any calculations at all?
 3 A. No.
 4 Q. Did you take into account your ownership of any
 5 real property?
 6 A. Yes.
 7 Q. What real property did you take into account?
 8 A. My home. Cars. A tractor. Things with
 9 equitable value.
 10 Q. What did you -- what did you use as far as the
 11 amount of your home?
 12 A. An estimated amount of what it was worth and
 13 estimated amount of what we owed.
 14 Q. Okay. Did you take into account the business
 15 property you own on, I believe, Vogel Street?
 16 A. I did.
 17 Q. What is that building worth?
 18 A. About 385 or so.
 19 Q. Why is this figure not at least 385 then?
 20 A. Because I still have an outstanding loan on it.
 21 Q. In an amount of how much?
 22 A. About 325 or 350.
 23 Q. Did you make any calculation for the value of
 24 your internet companies, G5 Internet or G5 Streaming?
 25 A. I did.

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1 Q. For G5 Streaming, what did you value your
 2 ownership of that company at?
 3 A. Value my ownership or value the assets of the
 4 actual company and the net worth?
 5 Q. I want -- if you made any determination of what
 6 the worth of that company was and, correspondingly, your
 7 interest in that company.
 8 A. 50 percent.
 9 Q. 50 percent of what, sir?
 10 A. I'm sorry. Are you asking me about Streaming
 11 or Internet?
 12 Q. Let's start with G5 Internet. What do you
 13 believe that company is worth total?
 14 A. Probably -- in October of 2019 it was probably
 15 worth about maybe 15. When it was all said and done
 16 that's how much we would pretty much have in October of
 17 2019, about 15,000.
 18 Q. What's G5 Internet's annual revenue for 2019?
 19 A. We have not filed taxes yet.
 20 Q. Do you know about how much revenue you have a
 21 month through the year 2019?
 22 A. I don't. I estimated our revenue is minimal.
 23 I mean, in 2019 we were struggling to make payroll.
 24 Q. With respect to G5 Streaming, what did you
 25 estimate the value of that company to be worth?

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1 A. Streaming? Zero. None.
 2 Q. Zero?
 3 A. That's correct.
 4 Q. Have you ever reported to any corporate
 5 information service that G5 Internet has revenue of
 6 \$7,000,000 per year?
 7 A. No.
 8 Q. Has that ever been true?
 9 A. To my recollection, no.
 10 Q. Have you ever had an occasion to state the
 11 revenue numbers for G5 Internet on any loan applications
 12 with any banks or other lending institutions?
 13 A. I don't recall, no.
 14 Q. Has G5 Internet, to your knowledge, ever taken
 15 out a loan?
 16 A. No.
 17 Q. Has G5 Streaming, to your knowledge, ever taken
 18 out a loan?
 19 A. I don't believe so, no.
 20 Q. Mr. Galvan, in preparing your affidavits in
 21 this case -- I'm looking at request for production
 22 number 18. Your response is none. The question is,
 23 Please produce any documents you reviewed in preparing
 24 your affidavits which have been filed in this case. Do
 25 you see that question?

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1 A. Yes.
 2 Q. It's your testimony today you've prepared no --
 3 you reviewed no documents?
 4 A. Preparing your affidavits? That's correct.
 5 Q. Yeah. Is that correct? Your testimony today
 6 is that you reviewed no documents in order to prepare
 7 those affidavits?
 8 A. That's correct.
 9 Q. I've gone back to the affidavit in support of
 10 your first amended petition, and the first sentence of
 11 the second paragraph that I've now put on the screen
 12 reads, I, Richard Galvan, hereby state that Blaine Crews
 13 did the following on October 21st, 2018, at 7:01 p.m.
 14 Did you review anything to get the exact date of time --
 15 date and time in that affidavit?
 16 A. That was just my estimate of when I called
 17 Blaine.
 18 Q. You didn't look at a phone bill or a phone or
 19 anything like that?
 20 A. I do not -- no, I didn't look at a phone bill.
 21 Q. That time is an estimate?
 22 A. That's correct.
 23 Q. I also sent you in February requests for
 24 production. Do you see those on the screen?
 25 A. I do.

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1 Q. I'm going to pull up here your responses to
 2 requests for production made in February of this year.
 3 Do you see those?
 4 A. Okay. Yes.
 5 Q. This was made -- these were made while you were
 6 being represented by Mr. Bence and Mr. Young and
 7 Ms. Chaisson-Munoz, I'll represent to you, and you
 8 understand that you filed -- they filed these answers on
 9 your behalf on the 21st of February, 2020. Do you
 10 understand that?
 11 A. Yes, I do.
 12 Q. With respect -- I'm going to take a minute to
 13 look at your responses. All of them -- most of them --
 14 there's big groups of them that are very similar. Okay.
 15 With respect to requests seven, six and five, it says
 16 you will make documents available for review at a
 17 mutually agreeable time. Do you see that?
 18 A. Yes.
 19 Q. I'm going to go back to my questions. That's
 20 five through seven. Have you made any billing or
 21 treatment records available to your lawyers?
 22 A. No.
 23 Q. Have you brought anything to your lawyers for
 24 the purpose of making available to me to answer the
 25 requests for production?

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1 A. No.
 2 Q. No documents whatsoever?
 3 A. No.
 4 Q. What have you done when you were answering my
 5 requests for production which I have now put up on the
 6 screen? Please describe for me your efforts to locate
 7 any documents responsive to these requests for
 8 production numbers one through 24.
 9 A. I don't have any records of any requests for
 10 production that you've asked in regards to your one
 11 through -- what did you say?
 12 Q. One through 24. There were 24 requests.
 13 A. Oh, through all of them?
 14 Q. Yeah.
 15 A. Oh. None for one. I don't have any for two,
 16 three --
 17 Q. Okay. Very politely, Mr. Galvan, before we go
 18 through all 24, let me interrupt you and ask you the
 19 question again that was on -- that was posed to you.
 20 How much time have you spent looking for records
 21 responsive to these requests for production?
 22 A. For questions one through -- for request for
 23 one through 24?
 24 Q. For all of them together, how much time have
 25 you spent trying to find documents related to my

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1 requests for production?
 2 A. I don't know how much exact time but I do know
 3 that I do not have any records.
 4 Q. Did you spend more than an hour looking for
 5 these documents?
 6 MS. NIX: Objection; form. How can he look
 7 for something he knows he doesn't have, Mr. Chapman?
 8 THE WITNESS: I don't know.
 9 Q. (BY MR. CHAPMAN) Let me ask you this
 10 question, Mr. Galvan. With respect to the documents
 11 requested in my request for productions, how much time
 12 did it take you to determine that you don't have any
 13 documents?
 14 A. I read it, and so -- I read this in about
 15 20 minutes and determined that I didn't have any
 16 records.
 17 Q. Okay. 20 minutes total?
 18 A. That's what it took probably to read this.
 19 Q. Okay. With respect to request for production
 20 number two, please produce copies of your phone bills
 21 for the year 2018. Do you see that request?
 22 A. I do.
 23 Q. Your response is that you have no phone bills
 24 for the year 2018?
 25 A. That's correct.

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1 Q. Is it your testimony here today that you have
 2 no ability to access your phone bills for the year 2018?
 3 A. That's correct.
 4 Q. Why is that?
 5 A. I don't -- I don't have any copies of bills
 6 from 2000-- 2018.
 7 Q. You don't have the ability to go get them from
 8 your phone company?
 9 A. No.
 10 Q. With respect to church activities that you
 11 conducted or your church activities with North Way Bible
 12 Church for the years 2005 and 2008 -- I'm on request
 13 number eleven -- is it your testimony here today that
 14 you have no records?
 15 A. That's correct.
 16 Q. For your corporate entities -- I'm looking at
 17 request for production number 15 -- is it your testimony
 18 here today that you do not have articles of
 19 incorporation, company agreements, bylaws, corporate
 20 minutes and organizational charts for those companies?
 21 A. That's correct.
 22 Q. With respect to the Linn family, Hannah's
 23 parents and Hannah and her siblings, how long have you
 24 and your wife known the Linns?
 25 A. About eight years maybe.

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1 Q. Eight years measured from when?
 2 A. From like 2005 to 2013. Or earlier. Maybe
 3 '04. Between eight and ten years. Eight to ten years,
 4 I would imagine.
 5 Q. Okay. When is the last time you had any
 6 interaction with any members of the Linn family?
 7 A. I don't recall. I don't recall.
 8 Q. After this incident with Hannah in 2007 did you
 9 remain friends with Hannah's dad?
 10 A. Yes.
 11 Q. For how long?
 12 A. Two years. I'm not sure.
 13 Q. Did you ever tell him what happened with Hannah
 14 in 2007?
 15 A. No, we never talked about it.
 16 Q. How many siblings does Hannah have?
 17 A. Two. Three. I think, three.
 18 Q. Okay. And you're familiar with all of those
 19 children, correct?
 20 A. I'm not familiar with all of them, but -- no,
 21 I'm not familiar with all of them.
 22 Q. Are you familiar with Payton Linn?
 23 A. Yes.
 24 Q. Is Payton Linn older or younger than Hannah?
 25 A. I believe she's younger.

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1 Q. Did you ever have an occasion to ask Payton
 2 Linn to wear a wedding ring so you could take her to a
 3 bar?
 4 A. Wow. No.
 5 Q. Never happened?
 6 A. No.
 7 Q. Did you ever ask any member of the youth group
 8 at North Way Bible Church to go to the beach with you by
 9 yourself?
 10 A. No.
 11 Q. Is it your testimony here today that the events
 12 with Blaine Crews in 2018 caused you to move the school
 13 for one of your children?
 14 A. Yes.
 15 Q. How many children did you have at the school at
 16 that time before you moved the one?
 17 A. I had one child that I moved.
 18 Q. What about the other children?
 19 A. I moved him to the school where the other two
 20 were attending.
 21 Q. Okay. And that was because of this incident
 22 with Mr. Blaine Crews in 2018? That's your testimony
 23 today?
 24 A. Absolutely.
 25 Q. To be clear, what school did you move him from

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1 and to?

2 A. He moved from STEM Academy in Harlingen to

3 Calvary, Calvary Christian School in Harlingen.

4 Q. Did he play on the golf team at Calvary

5 Christian School?

6 A. They don't have a golf team.

7 Q. Okay. You've denied that Hannah Linn was your

8 employee at Orbit Broadband. Did you have any other

9 female employees at Orbit Broadband?

10 A. Yes.

11 Q. How many?

12 A. That I don't know. I don't know.

13 Q. Did you ever ask employees at -- female

14 employees at Orbit Broadband to wear shorts to work?

15 A. Oh, no.

16 Q. Have you ever been prosecuted for any sexually

17 related offenses?

18 A. No.

19 Q. Have you ever been arrested for soliciting

20 prostitution?

21 A. No.

22 Q. With respect to your jobs leading up to when

23 you were still working for other people you were in

24 several sales jobs. Did you ever gain any experience

25 with internet search optimization as a part of your

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1 sales jobs?

2 A. No.

3 Q. Did you have anybody at any of your companies

4 that has that skill or expertise?

5 A. That can search the internet?

6 Q. No. Do you have anybody at any of your

7 companies that has expertise in internet search

8 optimization?

9 A. I don't know exactly what that means.

10 Q. Do you have any -- you don't have any

11 understanding of what that means, internet search

12 optimization?

13 A. No.

14 Q. And you have an internet service provider as

15 your company, correct?

16 A. It is.

17 Q. How do you market your ISP company?

18 A. Nowadays just through word of mouth.

19 Q. You don't market yourselves online?

20 A. We have a web page.

21 Q. Have you ever done anything with that web page

22 to try to increase it's frequency or priority in search

23 results?

24 A. We've run Google ads before.

25 Q. I'm going to ask you to look -- this will be

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1 Exhibit 11. It's a record from Travis County, Texas

2 that I obtained by public information request, I'll

3 submit to you. The first part is by Assistant

4 District -- Assistant County Attorney Claude Ricks, and

5 he says he has good cause to believe and charge that on

6 the 8th of July, 1992, before making and filing this

7 complaint in Travis County, State of Texas, Richard

8 Galvan did then and then knowingly offer and agree to

9 engage in sexual conduct for a fee, to wit, said

10 Richard Galvan offered and agreed to contact between the

11 mouth of said Richard Galvan and the genitals of

12 E. Leach for a fee. Do you know anything about that at

13 all?

14 A. No.

15 Q. Have you ever seen this document before at all?

16 A. No.

17 Q. I'm going to scroll down. Affidavit for

18 warrant and arrest and detention. Have you seen this

19 document before?

20 A. No.

21 Q. Order of commitment for Richard Edward Galvan

22 dated July 8, 1992, prostitution, Class B misdemeanor.

23 Have you seen this document before?

24 MS. NIX: Mr. Chapman, can we have a

25 moment, please?

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1 MR. CHAPMAN: Let me get an answer to this

2 question.

3 THE WITNESS: No, I've never seen that

4 document.

5 MR. CHAPMAN: All right. We'll take a

6 five-minute break. Thank you.

7 (Recess from 4:29 to 4:37.)

8 Q. (BY MR. CHAPMAN) All right. Let's go back

9 on. We ended, Mr. Galvan, I was asking you if you've

10 ever seen this order of commitment setting bail at

11 \$750.00 with respect to a prostitution arrest on

12 July 8th, 1992.

13 A. I don't -- I don't recall.

14 Q. Do you know what case this document is

15 referring to?

16 A. Yes.

17 Q. Okay. Were you arrested for solicitation of

18 prostitution in 1982 in Travis County?

19 MS. NIX: Objection; form. Answer.

20 THE WITNESS: Yes.

21 Q. (BY MR. CHAPMAN) To your knowledge, is this

22 document something that refers to your case?

23 A. I don't know. Yes, I guess.

24 Q. Okay. See this. There's a personal bond

25 there. Is that your signature on the personal bond?

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1 A. Yes.

2 Q. Okay. And you listed the responsible parties

3 for yourself as David Galvan and Cynthia Galvan. Those

4 are members of your family?

5 A. That's correct.

6 Q. Have you other occasion -- have you solicited

7 the services of prostitutes from time to time in your

8 adult life, sir?

9 A. No.

10 Q. Did you do that in 1992?

11 A. No.

12 Q. Is this a case of a mistake by the law

13 enforcement officer?

14 MS. NIX: Objection; form.

15 THE WITNESS: This case went to trial, I

16 believe, and the officer didn't show up and the case was

17 dropped.

18 Q. (BY MR. CHAPMAN) Okay. Was the police

19 informant a man or a woman?

20 MS. NIX: Objection; form.

21 THE WITNESS: I don't recall.

22 Q. (BY MR. CHAPMAN) Okay. I take it you dispute

23 this account of things that are on -- that's on the

24 screen now?

25 A. That's correct.

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1 Q. Okay. I'm going to pull up what will be marked

2 as Exhibit 12. Have you ever seen this article before,

3 sir?

4 A. No.

5 Q. It's an article obtained from the Harlingen --

6 from the Valley Morning Star in Harlingen, Texas. Are

7 you familiar with the Valley Morning Star as being a

8 newspaper in the Rio Grande Valley?

9 A. Yes.

10 Q. It says, A local youth group will be

11 refurbishing Dell computers to raise money to travel to

12 Africa. Generation Impact youth group from North Way

13 Bible Church hopes to raise \$30,000 for a missionary

14 trip to Uganda. Youth pastor Richard Galvan, who is

15 also the owner of MDI Computers in La Feria, purchased

16 115 computers from a Mercedes School District auction

17 and is donating them to the youth group to sell as a

18 fundraiser.

19 Do you recall newspaper articles about you

20 being the pastor, youth pastor or youth minister of

21 North Way Bible Church?

22 A. No.

23 Q. Do you recall ever protesting any newspaper

24 that said that?

25 A. No.

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1 Q. This is something you've never seen before in

2 your life?

3 A. That's correct.

4 Q. Did you make a trip to Uganda, a mission trip?

5 A. No.

6 Q. Did you raise \$30,000 for a mission trip to

7 Uganda?

8 A. No.

9 Q. Does this article ring any bells of details

10 concerning your work with regards to the North Way Bible

11 Church youth group?

12 A. Can you just hold it right there?

13 Q. Sure.

14 A. 115. MDI purchased 115 computers?

15 MS. NIX: From Mercedes and was donating

16 them to sell as a fundraiser.

17 THE WITNESS: I know one of the fundraising

18 options was for a trip to Nicaragua, but not to Uganda,

19 and there was some computers that were sold, but the

20 rest of it --

21 Q. (BY MR. CHAPMAN) Do you ever remember

22 giving -- do you ever remember giving a statement to the

23 newspaper about computers and raising money for this

24 youth group?

25 A. I don't remember.

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1 Q. During the last trip to Mexico Galvan said the

2 youth group was able to feed 40 families with food they

3 bought with the funds raised for that trip. Galvan

4 hopes that the group can raise enough money this year to

5 feed families in Africa as well. You don't recall

6 making any statement to the Valley Star about that?

7 A. No.

8 Q. Every part -- every year part of it is asking

9 for direction. Galvan said the Lord directed me where

10 he needed to be -- where we needed to be. This is a big

11 trip. The kids will be preaching to men and women in

12 other countries. Do you recall saying that to the

13 Valley Star for a newspaper article about the North Way

14 Bible youth group?

15 A. No.

16 Q. Next paragraph. Hannah Linn, youth group

17 leader and senior at Harlingen High School, said she is

18 looking forward to the opportunity to provide the needy

19 in Netebe with praise and worship. Linn, 18, said she

20 grew up attending church and has been involved with the

21 youth group since she was 13 years old.

22 Do you have any reason to dispute anything

23 in that that I just read in that sentence about Hannah

24 Linn?

25 A. I don't know age or how long.

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1 Q. Okay. You're not saying -- you're not saying
 2 any of that's incorrect, are you?
 3 A. I don't know. I don't know if it's correct or
 4 incorrect, to be honest with you. I don't know.
 5 Q. Do you know who Lauren Woodard is?
 6 A. Yes.
 7 Q. She's somebody you worked with at North Way
 8 Bible Church in relation to the youth group?
 9 A. No.
 10 Q. What's going on here? I can't get that off.
 11 Sorry. Okay. I don't know. Something technologically
 12 is going on here.
 13 All right. Last paragraph of this exhibit.
 14 Sonia Galvan, also a youth pastor at the church, said
 15 she hopes that her youth group can teach people in
 16 Africa that they don't necessarily need all the material
 17 things that other people may have and that they only
 18 need to have faith. Do you see that paragraph?
 19 A. Yeah, I see it.
 20 Q. Do you recall your wife ever giving an
 21 interview to the Valley Star as youth group pastor or
 22 youth group minister for North Way Bible Church?
 23 A. No.
 24 Q. And your testimony today still is that you
 25 categorically deny that you ever held any of those

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1 positions?
 2 A. That's correct.
 3 Q. Let's see here. Let me pull it up on the
 4 screen. The second article from November 2007,
 5 reprinted from the Valley Morning Star. That again
 6 cites you as youth pastor Richard Galvan. Have you ever
 7 seen this article?
 8 A. No.
 9 Q. Do you recall selling 20 computers in 2007 to
 10 try to raise money for a youth trip in July to possibly
 11 Uganda?
 12 A. No.
 13 Q. Did that ever happen?
 14 A. No.
 15 Q. Did you ever buy computers from a school
 16 district to raise money for North Way Bible Church youth
 17 missionary work?
 18 A. I believe, yeah, we did have a fundraiser for a
 19 church trip, and there was some computers that were
 20 purchased and refurbished and resold through the church
 21 for a trip. That is correct. But Uganda and all this
 22 other stuff, no.
 23 Q. Okay. So the Valley Morning Star just got this
 24 wrong when they say you're the youth minister or youth
 25 pastor?

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1 A. That's correct.
 2 Q. And you categorically deny it still?
 3 A. I do.
 4 Q. And you understand as we sit here today,
 5 Mr. Galvan, that this testimony, even though it's done
 6 remotely, it's done with a court reporter and you have
 7 been sworn in and it's the same as you were appearing
 8 before a judge or a jury in a court of law in the state
 9 of Texas and may be used for any purpose just as if you
 10 had been in the courtroom to give that testimony. You
 11 understand that, right?
 12 A. Correct.
 13 Q. Let me pull up what will be marked as
 14 Exhibit 14. Let me blow this up. This is an email
 15 Pastor Kelly Rumfield sent to my client, Blaine Crews,
 16 last night after you submitted your -- let me back up
 17 that one time -- after you submitted your supplemental
 18 discovery responses.
 19 It reads, To whom it may concern, my name
 20 is Kelly Rumfield. I am the pastor at North Way Bible
 21 Church. Richard Galvan was the acknowledged youth
 22 leader and minister of North Way Bible Church by me as
 23 pastor and by the board of the church during the time in
 24 question that Hannah Linn and her family attended the
 25 church. Hannah Linn was a member of the youth group

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1 that Richard Galvan oversaw and led.
 2 Is Mr. Pastor Rumfield of the North Way
 3 Bible Church -- you referred to him earlier in the day
 4 as the person you dealt with at the church, correct?
 5 A. That's correct.
 6 Q. Is he lying when he says you were minister of
 7 the North Way Bible Church, youth minister?
 8 A. He didn't call me a minister.
 9 Q. Let me read it again. I will have to get it a
 10 little bit lower. Richard Galvan was the acknowledged
 11 youth leader and minister of North Way Bible Church.
 12 It's on the second line. Do you see that, sir?
 13 A. I see it.
 14 Q. Does Mr. Pastor Kelly Rumfield lying when he
 15 emailed us and said that you were the acknowledged youth
 16 leader and minister at North Way Bible Church?
 17 A. I never had an official title. He was
 18 mistaken.
 19 Q. So you think the paster of North Way Bible
 20 Church is wrong about who has titles at North Way Bible
 21 Church? Is that what you're testifying to today?
 22 A. Yes.
 23 Q. Okay. He also goes on to say that he was
 24 acknowledged by him as pastor and by the board. You
 25 don't have any recollection that you were ever

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1 acknowledged by the board of North Way Bible Church as
 2 the acknowledged youth leader and minister?
 3 A. That's correct.
 4 Q. So do you believe -- who do you believe knows
 5 more about the titles at North Way Bible Church, you or
 6 Mr. Rumfield who's the pastor there?
 7 MS. NIX: Objection; form.
 8 THE WITNESS: I know that I was a volunteer
 9 and that I was a member of that church.
 10 Q. (BY MR. CHAPMAN) So the Valley Morning Star
 11 is wrong and Mr. Rumfield is wrong, correct?
 12 A. That's correct.
 13 Q. And you're giving this testimony under penalty
 14 of perjury, are you, sir? Is that correct?
 15 A. That is correct.
 16 Q. Have you ever had any criminal charges for
 17 writing bad checks or hot checks, Mr. Galvan?
 18 A. I did a long time ago.
 19 Q. Do you remember what years?
 20 MS. NIX: Objection; form.
 21 THE WITNESS: I don't.
 22 Q. (BY MR. CHAPMAN) Did that occur in Travis
 23 County or down in the Rio Grande Valley?
 24 MS. NIX: Running objection as to anything
 25 about writing or having hot checks as opposed to

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1 convictions.
 2 THE WITNESS: That was in Travis County.
 3 Q. (BY MR. CHAPMAN) I'm going to attach as
 4 Exhibit 15 case information regarding a lawsuit entitled
 5 Richard and Sonia Galvan d/b/a Orbit Broadband versus
 6 Larry Peace, et al. What is that suit about?
 7 A. I don't recall.
 8 Q. You don't recall at all what Exhibit 15 is
 9 about?
 10 A. I don't. Not as much. What's the date on it?
 11 I don't remember.
 12 Q. 2009.
 13 A. Okay.
 14 Q. Do you recall filing and obtaining a TRO
 15 against Larry Peace and others on behalf of Orbit
 16 Broadband in 2009?
 17 MS. NIX: Objection; form.
 18 THE WITNESS: Yes.
 19 Q. (BY MR. CHAPMAN) You do now remember that?
 20 A. I do recall the TRO that you had mentioned.
 21 Q. What was the subject of that TRO?
 22 A. Larry, I believe, Peace was, I believe,
 23 threatening us to -- I don't remember -- either run us
 24 out of town or take our business or something of that
 25 nature.

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1 Q. Who was Larry Peace?
 2 A. He was a -- Mike Peace was an individual that
 3 had lived in Harlingen that, I believe, had moved.
 4 Q. Okay. What relationship did Larry Peace have
 5 with Orbit Broadband?
 6 A. Orbit Broadband, LLC. He had none.
 7 Q. What were the allegations in your lawsuit
 8 against Larry Peace?
 9 A. I don't remember.
 10 Q. You filed a district court lawsuit in 2009 and
 11 you don't remember?
 12 A. I do not.
 13 Q. Who was your lawyer at the time? Do you
 14 remember that?
 15 A. I do not.
 16 Q. Do you know a Richard Rodriguez as an attorney?
 17 A. Yes.
 18 Q. Did he do work for you and your company?
 19 A. Yes, I believe so.
 20 Q. He filed this lawsuit for you?
 21 A. Yes.
 22 Q. Did you have any -- did you execute any
 23 affidavits in support of this lawsuit?
 24 A. I don't remember.
 25 Q. Do you remember whose affidavits were used to

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1 obtain the temporary restraining order?
 2 A. No, I don't.
 3 Q. Do you remember how this lawsuit was resolved?
 4 A. No, I don't.
 5 Q. Did you settle this lawsuit?
 6 A. I don't recall.
 7 Q. Did you give a deposition in this lawsuit?
 8 A. I don't recall. I don't believe so.
 9 Q. Did you have a trial?
 10 A. I don't recall.
 11 Q. Based on the court's record of events, it looks
 12 like somebody filed an order of dismissal of the
 13 lawsuit. Do you have any recollection? Is this
 14 refreshing your recollection at all about dismissing the
 15 lawsuit?
 16 A. No.
 17 Q. Let's see. Looks like that's the one I already
 18 opened. Do you know -- this is an additional view of
 19 the article. Is The Herald another newspaper in the Rio
 20 Grande Valley?
 21 A. I don't know. Yes, I believe so.
 22 Q. Okay. Do you know what city that operates out
 23 of?
 24 A. No, I don't.
 25 Q. This copy is very hard to read just because of

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1 the nature of the screen shot of it, and I acknowledge
 2 that. Are you aware of The Herald running any article
 3 about your Teens for Africa project with North Way
 4 Church?
 5 A. No.
 6 Q. You don't recall giving any interview to The
 7 Herald?
 8 A. No.
 9 Q. Do you recall filing a lawsuit against Ashley
 10 Nicole Montemayor and Alma Sue Rodriguez?
 11 A. No.
 12 Q. Did you have a personal injury suit that you
 13 filed in 2017 or is this somebody else?
 14 A. No, it's not me.
 15 Q. Okay. Mr. Galvan, have you ever undertaken to
 16 contact republishers of Court of Appeals opinions and
 17 asking them to take down the Court of Appeals opinion in
 18 your case?
 19 A. No.
 20 Q. Have you ever directed anybody else to do so on
 21 your behalf?
 22 A. What does that mean? I'm sorry. I don't
 23 understand.
 24 Q. Directing somebody else to do it on your
 25 behalf?

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1 A. Yeah.
 2 Q. Well, have you ever told somebody, See if you
 3 can get this taken down?
 4 A. At one point I did talk to a company about
 5 public restoration or one of those things.
 6 Q. Do you know when that occurred?
 7 A. I don't.
 8 Q. It wasn't today, was it?
 9 A. No.
 10 Q. Months ago?
 11 A. I don't recall.
 12 Q. Have you ever corresponded with any number of
 13 internet sites regarding removing your opinion from
 14 internet search results?
 15 A. Me? No.
 16 Q. Did you ever direct anybody to do so?
 17 A. No, I did not.
 18 Q. Did you ever hire anybody to do so?
 19 A. I did not.
 20 Q. Do you know if your wife has directed or hired
 21 anybody to remove internet search results containing the
 22 Court of Appeals decision in your case, in this case?
 23 A. I do not.
 24 Q. If the internet search provider -- if the
 25 internet sites involved respond and say that you

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1 directed them to do that for privacy concerns, are they
 2 wrong?
 3 A. Yes.
 4 Q. Because that never happened on your end?
 5 A. That's correct.
 6 MR. CHAPMAN: Okay. Let me take a short
 7 minute or two break and look over my notes. I think
 8 we're getting very close to done. Thank you.
 9 (Recess from 5:00 to 5:05.)
 10 Q. (BY MR. CHAPMAN) Mr. Galvan, have you been
 11 aware in this case that it's been the position of the
 12 Crewses that Hannah Crews could not consent to have sex
 13 with you?
 14 A. I don't know.
 15 Q. You don't know whether you knew that?
 16 A. No, I don't necessarily know. No.
 17 Q. Are you not aware that the Crewses have
 18 contended and the Court of Appeals has accepted that the
 19 facts in this case are that you sexually assaulted
 20 Hannah Crews in 2007 because she was incapable of giving
 21 consent?
 22 A. No.
 23 Q. You're not aware of that?
 24 A. No.
 25 Q. Is this the first time you've heard of this

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1 today?
 2 A. Yes.
 3 Q. Is that information you would have liked to
 4 have known before the end of your deposition two years
 5 in -- almost two years into some litigation?
 6 MS. NIX: Objection; form.
 7 THE WITNESS: I don't know.
 8 Q. (BY MR. CHAPMAN) You don't know if you would
 9 have liked to have known that?
 10 A. That's correct. I don't know.
 11 MR. CHAPMAN: Reserve the rest of our
 12 questions.
 13 COURT REPORTER: Ms. Nix, do you have any
 14 questions?
 15 MS. NIX: No, I reserve my questions but at
 16 some point I would expect to be asked about whether I
 17 want a copy of the stenographic recording or the video
 18 recording. I wasn't. For the record, I want a copy of
 19 the video recording. I don't care about the
 20 stenographic recording. Thank you.
 21 MR. CHAPMAN: Thank y'all.
 22 MS. NIX: Have a great day. See you
 23 tomorrow.
 24 MR. CHAPMAN: Thank you.
 25 COURT REPORTER: And, Davis, you do want

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1 this transcribed?
 2 MR. CHAPMAN: Yes, ma'am. I want a full
 3 sized and a condensed.
 4 COURT REPORTER: Perfect. Okay. Sounds
 5 good. Thank you.
 6
 7 (Proceedings concluded at 5:08 p.m.)
 8
 9 * _ * _ * _ * _ *
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1 CHANGES AND SIGNATURE
 2 NAME: RICHARD GALVAN DATE: MAY 14, 2020
 3 PAGE LINE CHANGE REASON
 4 _____
 5 _____
 6 _____
 7 _____
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 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
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 24 _____
 25 _____

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1 I, RICHARD GALVAN, have read the foregoing
 2 deposition and hereby affix my signature that same is
 3 true and correct, except as noted above.
 4
 5
 6 _____
 7 RICHARD GALVAN
 8 THE STATE OF)
 9 COUNTY OF)
 10 Before me, _____, on this day
 11 personally appeared, RICHARD 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 he 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 _____
 23 Notary Public in and for
 24 the State of Texas.
 25

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1 CAUSE NO. 2018-DCL-06387-I
 2 RICHARD GALVAN and) IN THE DISTRICT COURT
 3 SONIA GALVAN,)
 4 Plaintiffs,)
 5)
 6 VS.) 445th JUDICIAL DISTRICT
 7)
 8 BLAINE CREWS and)
 9 HANNAH CREWS,)
 10 Defendants.) CAMERON COUNTY, TEXAS
 11
 12 CERTIFICATE TO THE ORAL DEPOSITION OF
 13 RICHARD GALVAN
 14 MAY 14, 2020
 15 [REPORTED REMOTELY VIA VIDEOCONFERENCE]
 16
 17 I, Cathey Rimmer, Certified Shorthand Reporter in
 18 and for the State of Texas, hereby certify to the
 19 following:
 20 That the witness, RICHARD GALVAN, was duly sworn by
 21 me and that the transcript of the oral deposition is a
 22 true record of the testimony given by the witness;
 23 That the deposition transcript will be submitted on
 24 _____, to Ms. Angela Nix for examination and
 25 signature by the witness, and is to be returned to me by
 _____;
 That the amount of time used by each party at the
 deposition is as follows:
 Mr. C. Davis Chapman - 5 hours, 47 minutes

1 That pursuant to information given to the
2 deposition officer at the time said testimony was taken,
3 the following includes counsel for all parties of
4 record:

5 Ms. Angela Nix, Attorney for Plaintiffs;
6 Mr. C. Davis Chapman, Attorney for Defendants.
7 I further certify that I am neither counsel for,
8 related to, nor employed by any of the parties in the
9 action in which this proceeding was taken, and further
10 that I am not financially or otherwise interested in the
11 outcome of the action.

12 Further certification requirements pursuant to Rule
13 203 TRCP will be certified to after they have occurred.

14 Certified to by me this ____ day of _____,
15 2020.

Cathey Rimmer

CATHEY RIMMER, Texas CSR 519
Expiration Date: 04/30/2021
Kim Tindall & Associates, LLC
16414 San Pedro, Suite 900
San Antonio, Texas 78232
Phone 866.672.7880
Firm Registration No. 631

21
22
23
24
25

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.

CATHEY RIMMER, Texas CSR 519
Expiration Date: 04/30/2021
Kim Tindall & Associates, LLC
16414 San Pedro, Suite 900
San Antonio, Texas 78232
Phone 866.672.7880
Firm Registration No. 631

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