

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

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

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ORAL DEPOSITION OF  
RICHARD GALVAN  
MAY 14, 2020  
[REPORTED REMOTELY VIA VIDEOCONFERENCE]

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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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A P P E A R A N C E S

FOR THE PLAINTIFFS:

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ALSO PRESENT:

Ms. Sonia Galvan  
Mr. Blaine Crews  
Mr. Chris Denney  
Videoconference Host (a.m.)

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1 VIDEOCONFERENCE HOST: Hello. My name is  
2 Chris Denney. I will be your videoconference host  
3 today. Today's videoconference is provided by Kim  
4 Tindall and Associates. As your host I will be  
5 monitoring your proceeding to offer technical support.  
6 Although my camera may be off, if you should require  
7 support at any point during this proceeding you can  
8 verbally avert me or you can use the phone numbers  
9 provided in the chat tool and in my profile image, and I  
10 will reach out to the KTA Connect team directly to help  
11 you. Please consider using the audio microphone icon to  
12 mute your microphone when on breaks or not contributing  
13 to the record. The reporter's transcript is the  
14 official record, and audio quality is vial to that end.  
15 If we should have to pause for troubleshooting per the  
16 reporter's request, it is imperative that we do so.  
17 Today's videoconference is being recorded in its  
18 entirety, including the breaks, for the benefit of the  
19 reporter's transcript. If this proceeding was noticed  
20 by video, which it was, or upon all agreements of the --  
21 upon agreement of all the parties, a video copy of the  
22 record will be available to order. It is requested that  
23 all agreements as well as transcript and video orders be  
24 made on the record today. So thank you, and when  
25 everyone is ready, Mrs. Rimmer will deliver the read-on.

1                   COURT REPORTER: Today's date is May 15,  
2 2020. The time is 10:02 a.m. This is the oral  
3 deposition of Richard Galvan, in Cause Number  
4 2018-DCL-06387-I, Richard Galvan and Sonia Galvan vs.  
5 Blaine Crews and Hannah Crews, filed in the 445th  
6 District Court of Cameron County, Texas, and it is being  
7 conducted remotely in accordance with the First  
8 Emergency Order Regarding the COVID-19 State of  
9 Disaster, paragraphs 2.b and c. The witness is located  
10 at G5 Enterprises, located at 222 East Van Buren, Suite  
11 502, Harlingen, Texas. My name is Cathey Rimmer, Court  
12 Reporter, Texas CSR No. 519. I am administering the  
13 oath and reporting the deposition remotely by  
14 stenographic means from my residence within the state of  
15 Texas. My business address is 16414 San Pedro, Suite  
16 900, San Antonio, Texas. The witness has been  
17 identified to me through attestation of counsel. Would  
18 counsel please state their appearances and locations for  
19 the record, beginning with counsel for the Plaintiff?

20                   MR. CHAPMAN: Davis Chapman, counsel for  
21 the plaintiffs. I'm in Fort Worth, Texas.

22                   MS. NIX: Angela Nix, counsel for Richard  
23 and Sonia Galvan, Brownsville, Texas.

24                   (Witness sworn.)

25                   COURT REPORTER: Thank you. You may

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

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.

1 But sometimes you do these video things and people get  
2 crammed 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

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

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

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



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.

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.

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,

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?

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 --

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.

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.

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



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.

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.

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

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

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

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?

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

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. Elliana 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



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

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?

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

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?

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.

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.

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.

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



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

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.

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?

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.

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,

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

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?

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.



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

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?

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?

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

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,

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?

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?

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?



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?

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

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.

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

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?

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?

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

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.



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

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.

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

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?

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

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?

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.

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



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?

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.

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?

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.

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

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?

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.

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?



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?

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?

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?

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

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.

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

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?

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.



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?

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.

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

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

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

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

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

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



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.

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

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 your 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

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

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?

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.

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

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



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?

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

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

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.

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

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

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.

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



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?

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.

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.

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?

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

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.

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.

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



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,

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 --

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?

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

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

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.

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.

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?



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

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

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

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.

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.

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

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?

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,



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.

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.

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

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.

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

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

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

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.



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

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?

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.

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

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?

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,

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.

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.



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

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 --

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.

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

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

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?

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

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 monitorship 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



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?

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

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

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

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

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

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.

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?



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.

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. Midafternoon, 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

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.

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.

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

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?

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.

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?



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?

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?

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.

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.

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.

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

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.

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.



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.

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

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?

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?



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

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.

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,



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.

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?

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

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

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?

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

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

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



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.

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 knowledged -- 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.

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,

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?

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.

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?

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?

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.



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?

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

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.

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.

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.

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

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

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



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?

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?

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.

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.

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.

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.

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

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?



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

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

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

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.

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

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

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?

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



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

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

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.)

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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

\_\_\_\_\_  
RICHARD GALVAN

7

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.

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\_\_\_\_\_  
Notary Public in and for  
the State of Texas.

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CAUSE NO. 2018-DCL-06387-I

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

CERTIFICATE TO THE ORAL DEPOSITION OF  
RICHARD GALVAN

MAY 14, 2020

[REPORTED REMOTELY VIA VIDEOCONFERENCE]

I, Cathey Rimmer, Certified Shorthand Reporter in  
and for the State of Texas, hereby certify to the  
following:

That the witness, RICHARD GALVAN, was duly sworn by  
me and that the transcript of the oral deposition is a  
true record of the testimony given by the witness;

That the deposition transcript will be submitted on  
\_\_\_\_\_, to Ms. Angela Nix for examination and  
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.

*Cathy 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

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CERTIFICATION UNDER RULES 203 TRCP

The original deposition was/was not returned to the deposition officer on \_\_\_\_\_.

If returned, the attached Changes and Signature page contains any changes and the reasons therefor;

If returned, the original deposition will be delivered to Mr. C. Davis Chapman in accordance with Rule 203.3 TRCP.

That \$\_\_\_\_\_ are the deposition officer's charges to the Defendants for preparing the original deposition transcript and any copies of exhibits.

That a copy of this certificate will be served on all parties shown herein and filed with the Clerk on \_\_\_\_\_.

Certified to by me this\_\_\_\_\_ day of \_\_\_\_\_, 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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