

## **EXHIBIT 45**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF  
3                   ILLINOIS EASTERN DIVISION  
4                   JUDGE FRANKLIN U. VALDERRAMA  
5                   MAGISTRATE JUDGE SHEILA M. FINNEGAN  
6                   MASTER DOCKET CASE NO. 19-CV-01717

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10                  IN RE: WATTS COORDINATED PRETRIAL PROCEEDINGS  
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23                  DEPONENT: GARRY MCCARTHY  
24                  DATE:           JUNE 14, 2023  
25                  REPORTER:  SYDNEY LITTLE

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2

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1           Q. And why was that? Why was there nothing  
2 written?

3           MR. BURNS: Objection. Form.

4           A. I -- I'm not a big paper person. I want to  
5 hear it if I have questions about it. And then if  
6 there's any paper, like a picture or something like  
7 that, it all went back.

8 BY MR. FLAXMAN:

9           Q. And did you ever take notes about the  
10 meetings?

11          A. No.

12          Q. You also talked about this issue where your  
13 department was trying to get boxes from the federal  
14 investigation every so often. You remember that?

15          A. Yes.

16          Q. Did you ever communicate with federal  
17 authorities about the boxes?

18          A. I may have said something to [REDACTED]. I  
19 don't recall. But I -- I do know this very  
20 specifically. I asked [REDACTED], is there anything else  
21 to this? And he said, absolutely not. It's just these  
22 two officers. And when we tried to obtain more  
23 information, we couldn't obtain it because federal  
24 protections for the documents prevented that from  
25 happening.

1           Q. And did you try to obtain that information  
2 after [REDACTED] told you that it was just these two  
3 officers?

4           A. I believe we tried for a while to -- to Bob  
5 Klimas because there was some sort of a vetting that  
6 they -- the feds were talking about. And, eventually, I  
7 don't think we got anything.

8           Q. Well, when you say there was some sort of  
9 vetting, what do you mean?

10          A. In other words, they would -- you know, they  
11 would take them and redact things and things like that.  
12 But they never did any of it for us. To my  
13 recollection, we got absolutely nothing.

14          Q. And given that [REDACTED] had told you that  
15 there's nothing else, it's just these two officers, why  
16 did you want that other information?

17          A. To ensure that there was nothing else. And,  
18 like I said, you know, the -- the FBI was looking at  
19 criminal charges. That doesn't mean that we weren't  
20 going to pursue administrative charges if there was  
21 something there for that.

22          Q. And was it -- did you say that it was Klimas  
23 who was the one who was mostly responsible for trying to  
24 get that information?

25          A. I wouldn't say responsible. He was the guy