

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

## ORIGINAL

The video-recorded deposition of MADELINE  
MENDOZA, called by the Defendants for examination, taken  
pursuant to notice and pursuant to the Federal Rules of  
Civil Procedure for the United States District Courts  
pertaining to the taking of depositions, taken before  
Terry M. Barfield, Certified Shorthand Reporter and  
Notary Public, at 20 South Clark Street, Suite 1700,  
Chicago, Illinois, commencing at 10:09 a.m. on  
January 10, 2025.

1 BY THE WITNESS:

2 A. Right.

3 Q. After you watched these videos, did you make  
4 any attempt to try to reach out to Jackie Montanez  
5 and --

6 A. No.

7 Q. -- confront her about the things that you knew  
8 not to be true?

9 A. No.

10 Q. Okay. Why not?

11 A. Why should I? It -- I didn't have -- I don't  
12 have a reason to reach out to her for anything.

13 Q. Have you ever asked any third party to reach  
14 out to Jackie Montanez on your behalf to send her any  
15 sort of message?

16 A. No.

17 Q. Are you aware of any third party reaching out  
18 to her on your behalf?

19 A. No.

20 Q. Have you ever, either directly or through a  
21 third party, offered Ms. Montanez any financial  
22 compensation, any financial compensation?

23 A. No.

24 Q. Okay. Either as -- either directly or as part

1 of any proceeds that you could obtain from your lawsuit?

2 A. No.

3 Q. Okay. Are you aware of anybody else reaching  
4 out to Ms. Montanez and offering her any compensation?

5 A. No.

6 Q. Okay. Are you aware of Ms. Mulero doing that?

7 A. No.

8 Q. Okay. In your discovery answers, you  
9 reference that you had obtained, I believe, in 2017,  
10 some mental health treatment?

11 A. Yes.

12 Q. Is that true?

13 Okay. What -- are -- is my time period  
14 correct? Was that around 2017?

15 A. It's around, yeah. And it's therapy.

16 Q. All right. So --

17 A. I was seeing a counselor.

18 Q. All right. Before 2017, had you ever obtained  
19 any mental health counseling?

20 A. I don't recall.

21 Q. Okay. Did you obtain -- did you have any  
22 mental health counseling while you were in IDOC?

23 A. They forced me to live on a mental health  
24 unit.