

# **EXHIBIT C**

1	IN THE UNITED STATES DISTRICT COURT	1	APPEARANCES: (CONTINUED)
2	FOR THE NORTHERN DISTRICT OF ILLINOIS	2	
3	EASTERN DIVISION	3	KENNETH FLAXMAN LAW OFFICES
4	MADELINE MENDOZA, )	4	BY: MR. JOEL FLAXMAN
5	Plaintiff, )	5	200 South Michigan Avenue
6	vs. ) No. 23-cv-2441	6	Suite 201
7	CITY OF CHICAGO, et al., )	7	Chicago, Illinois 60604
8	Defendants. )	8	312.427.3200
9	MARILYN MULERO, )	9	Jaf@kenlaw.com
10	Plaintiff, )	10	Representing the Plaintiff,
11	vs. ) No. 23-cv-4795	11	Madeline Mendoza;
12	REYNALDO GUEVARA, et al. )	12	
13	Defendants. )	13	ROCK FUSCO & CONNELLY, LLC
14	The video deposition of MARILYN MULERO,	14	BY: MS. CATHERINE M. BARBER
15	called for examination pursuant to the Rules of	15	333 West Wacker Drive
16	Civil Procedure for the United States District	16	19th Floor
17	Courts pertaining to the taking of depositions,	17	Chicago, Illinois 60606
18	taken before Mary Kay Andriopoulos, Certified	18	312.494.1000
19	Shorthand Reporter in the state of Illinois, at	19	Cbarber@rfclaw.com
20	333 West Wacker Drive, 19th Floor, Chicago,	20	Representing the Defendant,
21	Illinois, on the 14th day of January,	21	City of Chicago;
22	2025, at the hour of 10:11 a.m.	22	
23	REPORTED BY: MARY KAY ANDRIOPoulos, CSR	23	
24	LICENSE NO: 084-002248	24	
		1	
			3
1	APPEARANCES:	1	APPEARANCES: (CONTINUED)
2		2	
3	HART MC LAUGHLIN & ELDRIDGE	3	THE SOTOS LAW FIRM, PC
4	BY: MR. BRIAN H. ELDRIDGE	4	BY: MR. JOHN J. TIMBO
5	MR. CARTER GRANT	5	141 West Jackson Boulevard
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10	Beldridge@hmelegal.com	10	Representing all Defendants,
11	Cgrant@hmelegal.com	11	except City of Chicago and Reynaldo
12	- AND -	12	Guevara;
13	ROMANUCCI & BLANDIN, LLC	13	
14	BY: MR. PATRICK DRISCOLL	14	BORKAN & SCAHILL, LTD
15	321 North Clark Street	15	BY: MR. TIMOTHY P. SCAHILL
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17	Chicago, Illinois 60654	17	Suite 1700
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19	Pdriscoll@rblaw.net	19	312.580.1030
20	Representing the Plaintiff,	20	Tscahill@borkanscahill.com
21	Marilyn Mulero;	21	Representing the Defendant,
22		22	Reynaldo Guevara.
23		23	ALSO PRESENT:
24		24	John D'Andrea, Videographer
		2	
			4



<p>1 A. Yes.</p> <p>2 Q. And what did you say in response to</p> <p>3 that?</p> <p>4 A. I was, like, okay.</p> <p>5 Q. Okay.</p> <p>6 A. I didn't --</p> <p>7 Q. What's the time, by the way?</p> <p>8 I don't -- I actually don't want to cut</p> <p>9 Katie off.</p> <p>10 THE VIDEOGRAPHER: Six hours and --</p> <p>11 let's see -- yeah, you're almost at six and a</p> <p>12 half hours.</p> <p>13 MR. SCAHILL: Oh, okay. I'll wrap up</p> <p>14 soon and give you --</p> <p>15 THE VIDEOGRAPHER: Actually, 6 hours</p> <p>16 and 25 minutes.</p> <p>17 MR. SCAHILL: Okay. All right.</p> <p>18 BY MR. SCAHILL:</p> <p>19 Q. How long was it between these two</p> <p>20 communications?</p> <p>21 A. Maybe like two to three months.</p> <p>22 Q. Have you told anyone else about those</p> <p>23 communications other than your attorneys?</p> <p>24 A. No, sir.</p>	<p>1 the proceeds of the lawsuit?</p> <p>2 A. No.</p> <p>3 MR. ELDRIDGE: Objection, form.</p> <p>4 BY MR. SCAHILL:</p> <p>5 Q. Okay. Are you aware that Ms. Montanez</p> <p>6 has given various interviews to media outlets</p> <p>7 that are on YouTube and the like, other than</p> <p>8 what your attorneys may have told you?</p> <p>9 MR. ELDRIDGE: Right.</p> <p>10 THE WITNESS: Yeah, I don't watch any</p> <p>11 of that stuff.</p> <p>12 BY MR. SCAHILL:</p> <p>13 Q. Okay. Have you -- well, is the answer</p> <p>14 no then?</p> <p>15 A. No.</p> <p>16 MR. ELDRIDGE: I mean, it's -- other</p> <p>17 than what your attorneys have told her.</p> <p>18 THE WITNESS: Right, besides what my</p> <p>19 attorneys told me.</p> <p>20 BY MR. SCAHILL:</p> <p>21 Q. Have you -- have you watched or</p> <p>22 listened to any statements that Ms. Montanez</p> <p>23 gave since she was released from prison?</p> <p>24 A. Like I said, I don't watch any of the</p>
<p>433</p> <p>1 Q. Okay. Not even family members or your</p> <p>2 spouse?</p> <p>3 A. No.</p> <p>4 Q. Okay. Is there any particular reason?</p> <p>5 A. I don't -- like I said, I don't discuss</p> <p>6 any of this with anybody. I --</p> <p>7 Q. Other than talking to this individual</p> <p>8 and, you know, passing that information to</p> <p>9 Jackie that, you know, you're not going to put</p> <p>10 the money in her books, have you ever sought to</p> <p>11 pass any information to Jackie through a</p> <p>12 third-party?</p> <p>13 A. No.</p> <p>14 Q. Have you ever communicated to a</p> <p>15 third-party to Jackie that if she supports your</p> <p>16 case, that you will give her some compensation?</p> <p>17 A. No.</p> <p>18 Q. Okay. Are you aware of Jackie having</p> <p>19 made those allegations?</p> <p>20 A. What allegations?</p> <p>21 Q. That -- that one of her co-defendants,</p> <p>22 either you or Ms. Mendoza, had contacted her</p> <p>23 through a third-party, and said that you would</p> <p>24 provide her some financial compensation out of</p>	<p>435</p> <p>1 stuff that she does.</p> <p>2 Q. So is the answer to my question no?</p> <p>3 A. It's no.</p> <p>4 MR. SCAHILL: Okay. I'm going to have</p> <p>5 a couple more, but I'm going to let -- I'm going</p> <p>6 to let Katie do this while I look through my</p> <p>7 notes, okay, because we're getting long in the</p> <p>8 day.</p> <p>9 (Whereupon, a discussion was had</p> <p>10 off the record.)</p> <p>11 MS. BARBER: All right. Can you guys</p> <p>12 hear me all the way down at the end of the</p> <p>13 table?</p> <p>14 MR. ELDRIDGE: Yes.</p> <p>15 THE WITNESS: Yes.</p> <p>16 EXAMINATION</p> <p>17 BY MS. BARBER:</p> <p>18 Q. So I'm Katie Barber. I represent the</p> <p>19 City in the case. I introduced myself earlier.</p> <p>20 I just have a few questions for you.</p> <p>21 One topic is, do you know somebody by</p> <p>22 the name of Adriana Mejia?</p> <p>23 A. Yes.</p> <p>24 Q. And how do you know her?</p>

