

# **EXHIBIT C**

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF ILLINOIS</p> <p>3 EASTERN DIVISION</p> <p>4 MADELINE MENDOZA, )</p> <p>5 Plaintiff, )</p> <p>6 vs. ) No. 23-cv-2441</p> <p>7 CITY OF CHICAGO, et al., )</p> <p>8 Defendants. )</p> <p>9 MARILYN MULERO, )</p> <p>10 Plaintiff, )</p> <p>11 vs. ) No. 23-cv-4795</p> <p>12 REYNALDO GUEVARA, et al. )</p> <p>13 Defendants. )</p> <p>14 The video deposition of MARILYN MULERO,</p> <p>15 called for examination pursuant to the Rules of</p> <p>16 Civil Procedure for the United States District</p> <p>17 Courts pertaining to the taking of depositions,</p> <p>18 taken before Mary Kay Andriopoulos, Certified</p> <p>19 Shorthand Reporter in the State of Illinois, at</p> <p>20 333 West Wacker Drive, 19th Floor, Chicago,</p> <p>21 Illinois, on the 14th day of January,</p> <p>22 2025, at the hour of 10:11 a.m.</p> <p>23 REPORTED BY: MARY KAY ANDRIOPOULOS, CSR</p> <p>24 LICENSE NO: 084-002248</p> <p>1</p>	<p>1 APPEARANCES: (CONTINUED)</p> <p>2</p> <p>3 KENNETH FLAXMAN LAW OFFICES</p> <p>4 BY: MR. JOEL FLAXMAN</p> <p>5 200 South Michigan Avenue</p> <p>6 Suite 201</p> <p>7 Chicago, Illinois 60604</p> <p>8 312.427.3200</p> <p>9 jaf@kenlaw.com</p> <p>10 Representing the Plaintiff,</p> <p>11 Madeline Mendoza;</p> <p>12</p> <p>13 ROCK FUSCO &amp; CONNELLY, LLC</p> <p>14 BY: MS. CATHERINE M. BARBER</p> <p>15 333 West Wacker Drive</p> <p>16 19th Floor</p> <p>17 Chicago, Illinois 60606</p> <p>18 312.494.1000</p> <p>19 cbarber@rfclaw.com</p> <p>20 Representing the Defendant,</p> <p>21 City of Chicago;</p> <p>22</p> <p>23</p> <p>24</p> <p>3</p>
<p>1 APPEARANCES:</p> <p>2</p> <p>3 HART MC LAUGHLIN &amp; ELDRIDGE</p> <p>4 BY: MR. BRIAN H. ELDRIDGE</p> <p>5 MR. CARTER GRANT</p> <p>6 One South Dearborn Street</p> <p>7 Suite 1400</p> <p>8 Chicago, Illinois 60603</p> <p>9 312.955.0545</p> <p>10 beldridge@hmelegal.com</p> <p>11 cgrant@hmelegal.com</p> <p>12 - AND -</p> <p>13 ROMANUCCI &amp; BLANDIN, LLC</p> <p>14 BY: MR. PATRICK DRISCOLL</p> <p>15 321 North Clark Street</p> <p>16 Suite 900</p> <p>17 Chicago, Illinois 60654</p> <p>18 312.458.1000</p> <p>19 pdriscoll@rblaw.net</p> <p>20 Representing the Plaintiff,</p> <p>21 Marilyn Mulero;</p> <p>22</p> <p>23</p> <p>24</p> <p>2</p>	<p>1 APPEARANCES: (CONTINUED)</p> <p>2</p> <p>3 THE SOTOS LAW FIRM, PC</p> <p>4 BY: MR. JOHN J. TIMBO</p> <p>5 141 West Jackson Boulevard</p> <p>6 Suite 1240A</p> <p>7 Chicago, Illinois 60604</p> <p>8 630.735.3300</p> <p>9 jtimbo@jsotoslaw.com</p> <p>10 Representing all Defendants,</p> <p>11 except City of Chicago and Reynaldo</p> <p>12 Guevara;</p> <p>13</p> <p>14 BORKAN &amp; SCAHILL, LTD</p> <p>15 BY: MR. TIMOTHY P. SCAHILL</p> <p>16 20 North Clark Street</p> <p>17 Suite 1700</p> <p>18 Chicago, Illinois 60603</p> <p>19 312.580.1030</p> <p>20 tscahill@borkanscahill.com</p> <p>21 Representing the Defendant,</p> <p>22 Reynaldo Guevara.</p> <p>23 ALSO PRESENT:</p> <p>24 John D'Andrea, Videographer</p> <p>4</p>



<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 style="text-align: right;">433</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 style="text-align: right;">435</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 style="text-align: right;">434</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> <p style="text-align: right;">436</p>

