

day?

A He said hello to me.

Q Okay. Just as you were mingling through the crowd?

A Yes, and he made a comment. He said, "I like that," when I shook somebody's hand and said, "Hello. Welcome."

Q Okay. During that party, did you observe Mr. Sterling do anything that you thought was inappropriate?

A He tried to corral the girls onto this platform to dance.

Q Okay.

A He was pushing them like this.

Q Okay. And were you included in that group?

A I was nearby and I went like that (indicating).

Q Okay. Did any of the girls get up and dance on the platform?

A Some did, some didn't.

Q Okay. Did you?

A No.

Q Okay. Did he ever actually touch you to try and get you to go up on the platform?

A I don't remember.

Q Okay. Did he say anything while he was attempting to get some of the girls to go up and dance on the platform?

A Just, "I said get up there and dance!"

Q Was anyone else up there dancing with the girls, any guests at the party?

A Maybe just a few. It was mostly the girls, like they were on display.

Q Okay. Okay. And what did you find inappropriate about that behavior?

A Him pushing them like cattle, you know. Just -- he didn't even know these women. And even if he knew them...

Q Okay. Did you observe Mr. Sterling do anything else that day at the party that you felt was inappropriate in any way?

A I don't recall.

Q Did you have any discussions with [REDACTED] about whether you were going to be paid as an employee or an independent contractor?

MS. ROIT: For the white party you're talking about?

MR. DENISTON: For the white party in the fall of 1993 or summer, whenever it was.

THE WITNESS: She said before we got there, "You will be paid in cash at the end of the party."

1 A No.

2 Q Did you ever tell anybody that [REDACTED] had  
3 raped you?

4 A No.

5 Q Okay. Any other lawsuits you can recall being  
6 involved in that you haven't told me about?

7 A He threw another small claims at me that the  
8 judge threw out.

9 Q What was his claim in that lawsuit?

10 A He said that I reneged a deal. That's what  
11 was written down.

12 Q Did you ever determine what deal he was  
13 claiming you reneged?

14 A He claimed that I agreed to leave him alone  
15 when I moved out of the house.

16 Q Okay. Any other lawsuits you can recall being  
17 involved in?

18 A No.

19 Q All right. After you started working for  
20 Mr. Sterling, his company, in August of 1994, when is the  
21 first time Mr. Sterling ever said or did anything that you  
22 observed that you felt was inappropriate?

23 A December 2nd.

24 Q 1994?

25 A 1994.

1 Q Okay. And what happened on December 2nd,  
2 1994?

3 A He came to my desk in property management. He  
4 said everybody really enjoys having me work here, was it  
5 comfortable at my desk, [REDACTED] says you're doing great  
6 work. And then he just somehow out of the blue asked me  
7 if I would consider being a mistress of a doctor friend of  
8 his. It wasn't worded like that.

9 Q How was it worded?

10 A That was the gist.

11 Q Well, how was it worded?

12 A Well, he said this doctor friend of his knew a  
13 girl who would come to his office once a week and play  
14 with him, make him feel good and he helped her out with  
15 her bills, like an extra thousand, \$1,100 a month and I'm  
16 like, "So?" And --

17 MS. ROIT: Is there any question pending?

18 MR. DENISTON: Yeah, what --

19 MS. ROIT: Additional conversation or --

20 MR. DENISTON: No, because she said it wasn't worded  
21 that way and so now I'm asking her how it was worded and  
22 she's telling me.

23 MS. ROIT: Okay, go ahead.

24 THE WITNESS: He said he's looking for a new girl to  
25 go visit this doctor once a week and play with him, make

1 him feel good, give him head. That's what he said. I was  
2 completely thrown back by that.

3 MS. ROIT: You've answered the question.

4 THE WITNESS: Okay.

5 Q BY MR. DENISTON: And this is while you were  
6 sitting at your desk in property management?

7 A Yes.

8 Q Where was Mr. Sterling standing when he said  
9 that?

10 A Um, like right in between the side to the left  
11 of me, in the front of me, kind of on the corner.

12 Q Okay.

13 A Looking down.

14 Q Okay. And was there anyone else in the  
15 general vicinity when he said this to you?

16 A No.

17 Q Okay. Who was -- were there any desks of  
18 people next to yours?

19 A There were desks next to mine, but nobody was  
20 in them.

21 Q Okay. Well, whose desks were those?

22 A The one to my left was where [REDACTED] and  
23 [REDACTED] often shared.

24 Q Okay.

25 A And then across from me would have been [REDACTED].

1 Q Okay.

2 A And then over in the other corner would have  
3 been [REDACTED].

4 Q Okay. Okay. Were any of those women there  
5 that day, just during the day?

6 A Yes.

7 Q Okay. Now, when Mr. Sterling said that to  
8 you --

9 A Mm-hmm.

10 Q -- what did you say, if anything, in response?

11 A "No, never done anything like that before."

12 Q Well, when he -- you said that he said he was  
13 looking for a girl to play with him, make him feel good,  
14 give him head once a week?

15 A Right.

16 Q Okay. When he said that, what did you say?

17 A Nothing. I was just like -- I was staring at  
18 him in shock.

19 Q Okay. Well, did he ask you --

20 A Yeah. He said, "Are you interested" --

21 Q -- to be the girl?

22 MS. ROIT: Let him finish his question. Okay?

23 THE WITNESS: Sorry.

24 Q BY MR. DENISTON: Did he ask you to consider  
25 being the new girl?

1 A Yes.

2 Q Okay. And what did you say --

3 A No.

4 Q -- when he said that?

5 Okay. Did you say anything else?

6 A No. Right after that, no.

7 Q Okay. Did that end the conversation?

8 A No.

9 Q Okay. Then what did Mr. Sterling say after  
10 you said, "No"?

11 A "Why don't you have lunch with him?"

12 Q What did you say?

13 A I'd think about it. It was the least  
14 offensive way I knew how to respond to something so  
15 outrageous.

16 Q All right. And what did Mr. Sterling say  
17 after you said that you would think about it?

18 A I don't remember the sequence, but I remember  
19 him also saying, "You date, don't you?" And I said,  
20 "Sometimes." And he said, "Well, if you have sex, you  
21 might as well get paid for it."

22 Q Okay. And this was at the same conversation  
23 at your desk in property management; right?

24 A Yes.

25 Q Okay. What did you say after he said, "If you

have sex, you might as well get paid for it"?

A I don't recall saying anything. I was pretty shocked.

Q Okay. Anything further you can recall being said between you and Mr. Sterling in that conversation?

A He said, "You need a man to take care of you."

Q What did you say in response to that?

A I said, "I take pretty good care of myself."

Q What did Mr. Sterling say in response to that?

A I believe [REDACTED] came walking in at that point and shocked him.

Q Shocked him?

A Well, he went -- he jumped. He didn't expect her to come in. He thought she was at lunch.

Q How do you know he didn't expect her to come in?

A Because she was at lunch.

Q Okay. Did he tell you he wasn't expecting her to come in?

A No, but I could see him react with surprise.

Q Okay. And when [REDACTED] came in, did that end the conversation?

A Yes.

Q Okay. Okay. Did Mr. Sterling tell you who the doctor was he was talking about?



1 A No.

2 Q Did you ever learn who the doctor was he was  
3 talking about?

4 A No.

5 Q Did you ever form a belief of what doctor he  
6 was talking about?

7 A No.

8 Q All right. When [REDACTED] came in and  
9 Mr. Sterling left, did you say anything to [REDACTED] about  
10 what had just happened?

11 A I never said Mr. Sterling left.

12 Q Oh, I thought -- I misunderstood.

13 A No, she walked in.

14 Q Okay. Okay. When she walked in, I understood  
15 you to say the conversation stopped.

16 MS. ROIT: Yeah, but she didn't say he walked out.

17 MR. DENISTON: Oh, okay.

18 Q So what happened next? [REDACTED] walks in, the  
19 conversation stops, then what happened?

20 A He said, "Oh, Christine, tell [REDACTED] what you  
21 were just saying about her."

22 Q Did you say anything in response to that?

23 A I said what a wonderful supervisor she is and  
24 how I really enjoy working with her.

25 Q Okay. Anything else?

1 A After that I really don't remember. I know  
2 Nikki said thank you and that's all I really remember.

3 Q Okay. Did that end the conversation with  
4 Mr. Sterling?

5 A No.

6 Q Okay. What else was in the conversation?

7 A He asked me to come into his office.

8 Q Immediately?

9 A Yes.

10 Q Okay. And at that point did he leave to go  
11 back to his office?

12 A Yes.

13 Q Okay. And he --

14 A And he asked me to come with him.

15 Q Okay. Was [REDACTED] in your office when  
16 Mr. Sterling asked you to come into his office?

17 A Yes. She was on her way back to her office,  
18 so she was in front of us when he said, "Come to my  
19 office."

20 Q Okay. And then did you follow Mr. Sterling  
21 into his office?

22 A Yes.

23 Q And was anyone else in the office other than  
24 you and Mr. Sterling when you got there?

25 A No.

1 Q Okay. And did you have a further conversation  
2 with Mr. Sterling in his office?

3 A Yes.

4 Q Okay. And what was said in that conversation?

5 A When we first got in the office, he said, "So,  
6 how old are you now?"

7 Q Okay. What did you say?

8 A I told him my age.

9 Q And what did he say?

10 A "You look pretty good for your age."

11 Q What did you say?

12 A Nothing.

13 Q Okay. And was there any -- so you gave no  
14 response at all to that?

15 A No. I just stood there.

16 Q Okay.

17 A Pretty numb.

18 Q Okay. Did he say anything else?

19 A He said, "Stand over there," and he shoed me  
20 with his hand like this (indicating). "Stand over there.  
21 Let me look at you. Turn around," and he went like that  
22 (indicating).

23 Q And did you do it?

24 A I turned around once and I said -- I was -- my  
25 attitude was why are you having me do this?

1 Q Okay. So you turned around once?

2 A Mm-hmm.

3 Q Then did you say anything?

4 A No.

5 Q Okay. And then after you turned around once,  
6 did he say anything else?

7 A I don't -- I don't remember.

8 Q Did that end the conversation?

9 A Yes. The phone rang.

10 Q And did he answer the phone?

11 A Yes.

12 Q And then did you walk out of the office?

13 A Yes.

14 Q Okay. Did you go back to your office?

15 A I went back to my desk.

16 Q Okay. Was anyone -- any of the women you  
17 mentioned earlier sitting at the adjacent desks when you  
18 went back?

19 A No.

20 Q Okay. What time of day did this happen on  
21 December 2nd?

22 A It was around lunchtime.

23 Q Okay. So does that mean somewhere around noon  
24 or one o'clock?

25 A Yeah, somewhere in there.

1 '95 and this conversation you had with [REDACTED] in  
2 June or July of '95?

3 A Between -- did I tell anybody else besides  
4 [REDACTED] and [REDACTED] between December '94 and summer of '95?

5 Q Right.

6 A No.

7 Q Okay. Where were you when you told [REDACTED] in  
8 June or July of '95?

9 A It was the kitchen.

10 Q Okay. Who else was there, if anybody?

11 A Nobody that I saw.

12 Q Okay. As best you can recall, tell me  
13 everything that was said in that conversation with [REDACTED].

14 A I told her the gist of what had happened.

15 Q And what did [REDACTED] say in response, if  
16 anything?

17 A She validated it and said, "Oh, it's nothing  
18 unusual."

19 Q Did [REDACTED] explain what she meant by saying,  
20 "It's nothing unusual"?

21 A Yes.

22 Q What did she say in that regard?

23 A In that regard?

24 Q Yeah.

25 A I don't remember exactly how the conversation

1 went.

2 Q Again, I'm not asking for exact words if you  
3 can remember the substance of what was said.

4 A The substance was that Donald Sterling often  
5 made propositions to other employees, sexual propositions  
6 in exchange for money.

7 Q Okay. Did she tell you what other employees  
8 he had done this with?

9 A Yes.

10 Q Who?

11 A [REDACTED]

12 [REDACTED] Can't recall any  
13 more in the moment.

14 Q Okay. While you worked for Mr. Sterling, did  
15 you ever contact any of these women to confirm whether or  
16 not Mr. Sterling had done that?

17 A While I was working at Sterling Corporation,  
18 did I contact any of these women?

19 Q Right.

20 A No, I didn't contact any of them.

21 Q Why not?

22 MS. ROIT: That's argumentative, Counsel. It also  
23 assumes facts not in evidence that there should be a  
24 reason for it.

25 But you can answer the question if you know.

1 Mr. Sterling just did; is that right?

2 A No.

3 Q No, okay. How did it happen that you told  
4 Dori about this incident?

5 A I finished what I was doing at the copy  
6 machine and then I went into her office.

7 Q Okay.

8 A And said that.

9 Q I see. Anything else that you can recall  
10 saying to Dori on that occasion?

11 A No.

12 Q Okay. Okay. Anyone else you told about that  
13 incident in the copy room?

14 A Not that I remember.

15 Q Okay. All right. We've jumped a little bit  
16 ahead in time here and I'm going to try and go back and  
17 see if we can take this in chronological order as much as  
18 possible.

19 You were telling me that these touchings and  
20 inappropriate greetings with Mr. Sterling started in  
21 January or February of 1995. Um, what's the next conduct  
22 or behavior of Mr. Sterling that you personally observed  
23 or personally heard that you felt was inappropriate from a  
24 sexual standpoint or context?

25 A I don't remember exactly when, but he was

1 always touching other employees and I could see their  
2 uncomfotability.

3 Q Who were those other employees that you  
4 observed him touching?

5 A [REDACTED]. Are we talking  
6 about in the winter of '95 or just any time?

7 Q Um, I was trying to take it in chronological  
8 order and you said you couldn't recall exactly when it  
9 was, so just any time since you can't recall when it was.

10 A [REDACTED]  
11 Did I say [REDACTED]? Let's see. [REDACTED]

12 [REDACTED] That's all I can remember right now.

13 Q Okay.

14 A Nancy from the hotel.

15 Q From what?

16 A The hotel.

17 Q Okay. When you say "from the hotel," what do  
18 you mean by that?

19 A The hotel that Donald Sterling owns. [REDACTED] is  
20 the manager there.

21 Q Oh, okay. Her last name?

22 A Something like [REDACTED].

23 Q Okay. Does that exhaust your memory at this  
24 time?

25 A At this point.



1 Q Okay. Now, these other occasions where you  
2 observed him touching other employees, are we talking  
3 about the -- the greetings and touchings that you  
4 described that he did towards you, or is it some other  
5 kind of touchings that you're talking about?

6 A You mean were they the same between me and the  
7 other employees?

8 Q Generally speaking, were they the same? Are  
9 we talking about greetings where he'd go up and shake  
10 people's hands, grab their shoulders, put his cheeks next  
11 to hers? All the things that you described that he did  
12 towards you, is that what you're talking about with these  
13 other employees or are you talking about some different  
14 kind of touching?

15 A It was basically the same, but it wasn't  
16 necessarily just the beginning of hello. Sometimes he  
17 would just come into the office and just go up to somebody  
18 and squeeze them.

19 Q Okay. Without saying anything?

20 A "Hi, how are you?" "How are we doing on  
21 work?" "I love you." "You're my favorite." "Isn't she  
22 wonderful?" Things like that.

23 Q Okay. All right. What is the -- what is the  
24 next incident that you can recall in 1995 -- again, if you  
25 can take it in chronological order, if that's possible in

1 said or did something that you felt was inappropriate from  
2 a sexual standpoint?

3 A I don't remember specifics, but he would  
4 frequently try to engage in these conversations with me.

5 Q In these conversations, what conversations are  
6 you talking about?

7 A He would say, "Don't you know anyone who wants  
8 to make extra money? You must know actresses who are out  
9 of work who want to make some extra money."

10 Q Okay. You're talking about conversations  
11 about getting a massage therapist?

12 A Yes.

13 Q Okay. The -- when he told you that he needed  
14 a massage therapist and asked if you knew anybody that  
15 could do that, did you -- did you interpret his comments  
16 to mean that he was looking for someone to provide him  
17 with sexual services?

18 A He eventually made that clear to me.

19 Q Okay. But let's focus on the first time you  
20 had this conversation with him in mid-February to early  
21 March of 1995. At that time did you interpret him to be  
22 saying to you that he wanted you to find him a girl that  
23 would provide some sort of sexual services for him?

24 A I didn't interpret it. I knew that's what he  
25 wanted.

1 Q Okay. And how did you know it?

2 A As I said earlier, he could see that I really  
3 wasn't understanding what he was asking for, and then he  
4 became more specific. He said, "I need someone to massage  
5 me, stretch me out, play with me, make me feel good. Do  
6 you know anyone like that?" And I would still say, "No."  
7 And he would say, "You know, somebody who has a life and  
8 wants to make some extra money. You know, come to the  
9 office couple times a week and go to the fourth floor and  
10 engage in making me feel good."

11 Q Okay.

12 A And there was a point where I asked him  
13 specifically what he meant and he let me know by either  
14 saying sex or give head, something like that.

15 Q Okay. Well, let's focus on the first  
16 conversation, though. Okay? I realize that you're saying  
17 that there were other conversations about it, but the  
18 first conversation you had with him about it, um, you say  
19 that you knew at that time --

20 A Mm-hmm.

21 Q -- that he was looking for a girl to provide  
22 sexual services for him.

23 A Mm-hmm.

24 Q Um, is the reason you felt you knew that was  
25 because he was saying he wanted someone to play with him

1 and make him feel good? Is that -- are those the words  
2 that you interpreted as meaning sexual services?

3 A No.

4 Q Okay. Why did you know at that time, at this  
5 first conversation, what was it that he said to you or  
6 maybe somebody else said to you that made you believe that  
7 he was looking for a girl to provide sexual services to  
8 him?

9 A As I said earlier, when he could see that I  
10 didn't understand what he was asking for, he made it very  
11 clear to me, and I don't remember exactly how he worded  
12 it.

13 Q Okay. Well, give me your best recollection of  
14 how he worded it since you're saying he made it clear to  
15 you. I'd like your best recollection of how he made it  
16 clear to you that he was looking for a girl to provide him  
17 with sexual services?

18 MS. ROIT: Again, you're looking at that first  
19 conversation only?

20 MR. DENISTON: That's right.

21 THE WITNESS: I'm not going to guess how he worded  
22 it, but I knew exactly what he wanted.

23 Q BY MR. DENISTON: Okay. But he didn't -- in  
24 that first conversation, he never said that he wanted a  
25 girl to provide him with sexual services; correct?

1           A           I don't know how he worded it, but that was  
2 the understanding, yes.

3           Q           Okay. Well, that's not what I asked. My  
4 question was: Did he ever say in that first conversation  
5 that he wanted a girl to provide him with sexual services?

6           MS. ROIT: You're talking about using that specific  
7 language?

8           MR. DENISTON: Yes.

9           MS. ROIT: Okay.

10          THE WITNESS: I don't remember.

11          Q           BY MR. DENISTON: Okay. Did he ever say in  
12 that first conversation that he wanted a girl to give him  
13 head?

14          A           I don't remember exactly how he worded it.

15          Q           Okay. Did he ever say in -- well, that's not  
16 answering my question. Do you recall him saying that or  
17 not?

18          A           I don't remember.

19          Q           Okay. Do you recall him saying in that first  
20 conversation that he wanted a girl to provide him with  
21 oral sex?

22          A           I don't remember those words.

23          Q           Can you recall anything else that he said in  
24 that first conversation that you haven't told me about  
25 that indicated to you that he wanted a girl to provide him

1 with sexual services?

2 A I just remember sexual favors coming in.

3 Q In the first conversation?

4 A Yes, sexual favors.

5 Q When did that come in?

6 A Sometime -- that's how we came to the  
7 understanding that I knew what he wanted.

8 Q So sometime during the first conversation you  
9 had -- conversation you had with him about this subject in  
10 mid-February to early March 1995, he used the words  
11 "sexual favors"?

12 A Yes, I remember that.

13 Q Now, in subsequent conversations about this  
14 subject, about you finding a girl for him, was he ever  
15 more explicit than using the words sexual favors?

16 A You mean later?

17 Q Yeah, in some later conversation.

18 A Yes.

19 Q Okay. In what way was he more explicit in  
20 later conversations about that subject?

21 A He would say, "I want someone who will give me  
22 head or I want someone who will, you know, let me put it  
23 in or who will suck on it."

24 Q When is the first time you can recall  
25 Mr. Sterling telling you that he wanted you to find him a

1 girl that would give him head or let him put it in or let  
2 her suck on it?

3 A I recall late March '95.

4 Q Did he use all of those phrases at that time  
5 or just one of them?

6 A In late March?

7 Q Right.

8 A I don't remember exactly.

9 Q Okay. And where were you when you had that  
10 conversation?

11 A In his office.

12 Q And how did it come about that you were in his  
13 office at that point?

14 A He called me in there.

15 Q Okay. And what did he say to you when he  
16 called you in?

17 A He said, "I want you to get some girls in here  
18 for me to interview." And I would say, "For what?" And  
19 he said, "We've discussed this already. I want a massage  
20 therapist, someone to stretch me out, play with me, make  
21 me feel good." And I said, "Well, I don't know how to do  
22 that." He said, "You get on the phone and you start  
23 calling people."

24 Q When in that conversation did he use the words  
25 that he wanted you to find a girl to give him head or let

1 him put it in or let her suck on it?

2 A Sometime in late March.

3 Q What part of that conversation did he say  
4 that? The beginning of the conversation? The middle?  
5 The end?

6 A I don't remember exactly, but it was most  
7 likely at the end.

8 Q Did you tell him you wouldn't do it?

9 A I said, "I can't do that."

10 Q Okay. And what did he say?

11 A He said, "Well, just get some massage  
12 therapists in here for me. Make some phone calls tonight  
13 at home."

14 Q Okay. And what did you say to that?

15 A I said, "I don't know how to do that,  
16 Mr. Sterling."

17 Q And what did he say?

18 A He said, "Find a way. I'm telling you to do  
19 it."

20 Q Okay. What did you say?

21 A You know, I don't remember how that  
22 conversation ended, but I do remember going back to my  
23 desk and feeling very overwhelmed and --

24 MS. ROIT: He's only asking you about the  
25 conversation right now.



1 A Yeah.

2 Q Whited?

3 A Whited.

4 Q Whited.

5 A W-h-i-t-e-d. White with a D.

6 Q Okay.

7 THE REPORTER: What was the spelling?

8 THE WITNESS: W-h-i-t-e-d, Whited.

9 [REDACTED]

10 [REDACTED]. That's all I can remember right now.

11 Q BY MR. DENISTON: Now, all these people that  
12 you've listed for me, did you tell all these people during  
13 the period of time you worked for Mr. Sterling?

14 A Yes.

15 Q Okay. All right. What is the next incident  
16 that you can recall that you personally observed or  
17 overheard in which Mr. Sterling engaged in some conduct or  
18 behavior that you felt was inappropriate from a sexual  
19 standpoint?

20 A Something [REDACTED] told me. Is that --

21 Q I'm looking for things you observed yourself.

22 A Okay.

23 Q Not something somebody else saw and told you  
24 about.

25 A Okay. Approximately March '95. Donald

1 Sterling said he has a friend coming into town.

2 Q Okay.

3 A And he asked me if I'd like to have dinner  
4 with him.

5 Q With the friend?

6 A Yes.

7 Q Okay. Okay. And did he tell you the name of  
8 this friend?

9 A No.

10 Q Tell you anything about the friend?

11 A Yes.

12 Q What did he tell you about the friend?

13 A He said he's the [REDACTED]  
14 coming in from New York for a few days.

15 (Mr. Lagin leaves the deposition  
16 room.)

17 THE VIDEOGRAPHER: I didn't hear your answer.

18 MR. DENISTON: If you could repeat it. He said he  
19 didn't pick it up.

20 THE WITNESS: He said he was the [REDACTED]  
21 [REDACTED] coming in town from New York for a few days.

22 Should I put this up?

23 MR. DENISTON: No, it was the other...

24 MS. ROIT: Eric stumbled on it as he rushed out of  
25 here.

1 THE WITNESS: Okay.

2 Q BY MR. DENISTON: Now, this dinner he was  
3 asking you if you'd like to have with this friend, was  
4 this just you and the friend or was Mr. Sterling also  
5 supposedly going to be at this dinner?

6 A He said it was just myself and the friend.

7 Q Okay. All right. And what did you say when  
8 Mr. Sterling asked you that?

9 A I said, "Well, how do you know that we would  
10 like each other?" And he said, "Well, I'm talking about  
11 you can make some money." I said, "What do you mean?" He  
12 said, "Well, you can make \$300 a night. Go out and have  
13 dinner with him, go spend the night with him at his hotel,  
14 have sex with him." And again he said, "You can, you  
15 know, let him put it in or you can suck on it."

16 Q Um, okay. In these conversations where you've  
17 been talking about him using the phrase let him put it in  
18 or you can suck on it or some other girl can suck on it,  
19 was he using the word "it" or did he actually use a word  
20 for penis?

21 A I don't remember exactly.

22 Q Or did he use that word?

23 A You know, I don't remember.

24 Q All right. Okay. So -- and so when he told  
25 you that, what did you say in response?

1 A I said, "No, I'm not interested in that."

2 Q Okay. Was there any further discussion  
3 between you and Mr. Sterling at that time?

4 A Yes.

5 Q Tell me what else was said.

6 A He said, "Why not? You can make a lot of  
7 money for three or four nights." I said, "It's not my  
8 style. I don't do that."

9 Q Anything else?

10 A He said, "Do you know anybody who would be  
11 interested in doing that?"

12 (Mr. Lagin returns to the  
13 deposition room.)

14 Q BY MR. DENISTON: And what did you say?

15 A I said, "No, I don't."

16 Q Okay. Any further conversation between you  
17 and Mr. Sterling?

18 A Yes.

19 Q Okay. What else?

20 A He said, "Surely you must. You must know a  
21 lot of out-of-work models and actresses who would like to  
22 make some extra money."

23 Q And what did you say in response?

24 A I said, "No, I don't. Most of my friends are  
25 men."

1 A [REDACTED] told me and [REDACTED] told me.

2 Q Did either of them tell you why [REDACTED] asked  
3 [REDACTED] to leave?

4 A Yes.

5 Q Okay. What were you told?

6 A [REDACTED] told me that Mr. Sterling had it in for  
7 her, that it was just her turn and she felt like she was  
8 put under a microscope and that Diane had asked her to  
9 just work part time.

10 Q And what -- do you know what she said when  
11 [REDACTED] asked her to work part time?

12 A I recall her saying that she needs full-time  
13 work.

14 Q So when you said earlier that you were told  
15 that [REDACTED] had been asked to leave by [REDACTED], were you  
16 talking about being asked to work full -- part time or did  
17 she actually as far as you know affirmatively tell her --  
18 tell [REDACTED] that she had to leave?

19 A My understanding was that she had a choice, to  
20 either work part time or to leave.

21 Q Okay. Okay. Now, you also mentioned that you  
22 told Darren sometime in the June, July and August period  
23 that you were stressed out by Mr. Sterling's abusive  
24 behavior toward you. What did [REDACTED] say in response to  
25 that?

1           A       He tried to be comforting and say, "Oh, that's  
2 just Sterling."

3                    During those months I also complained about  
4 how obsessed Donald Sterling was with these hostesses or  
5 potential hostesses that I was interviewing.

6           Q       Okay. We'll eventually get to the hostesses  
7 part, but right now I'd like to find out what is the next  
8 behavior or conduct of Mr. Sterling that you can recall  
9 observing where he acted inappropriately in some way from  
10 a sexual standpoint?

11           A       It was during those months that I was  
12 interviewing the hostesses.

13           Q       We're talking about June through August --

14           A       Yes.

15           Q       -- time period?

16                    Okay. What happened during that time period?

17           A       Most days that he was in the office and it was  
18 a day that I was interviewing the girls applying to be  
19 hostesses, he would ask me -- well, first of all, he  
20 instructed me to grade them on a scale of 1 to 10 and mark  
21 that on their application. And he always asked me, "Did  
22 you get all of their information, their name, their  
23 address, their phone number, their pictures?"

24           Q       Let me show you a document and maybe this  
25 can -- maybe you can put this more in a more precise time

1 frame.

2 A Okay.

3 MR. DENISTON: Let's mark as Exhibit 11 -- we're up  
4 to 11?

5 (Defendants' Exhibit 11 was  
6 marked for identification and  
7 is attached hereto.)

8 Q BY MR. DENISTON: If you could please look at  
9 what I've marked as Exhibit 11.

10 A (Peruses.)

11 Okay.

12 Q Did you and [REDACTED] prepare what we've  
13 marked as Exhibit 11?

14 A No.

15 Q Okay. Who prepared those documents, if you  
16 know?

17 A Mr. Sterling and [REDACTED] and myself, but mostly  
18 them.

19 Q Now, there's a signature above the typewritten  
20 name at the bottom of each page that says Christine Tyler.  
21 Is that your signature?

22 A Yes.

23 Q Okay. Why were you using the name Tyler?

24 A He -- Mr. Sterling asked me to.

25 Q Did he tell you why he wanted you to use that

1 name instead of your real last name?

2 A He didn't give me a reason why, no.

3 Q Did you ask him why?

4 A Yes.

5 Q What did he say?

6 A He said Jaksy, my last name, is too difficult  
7 to remember or say.

8 Q Okay. Now, now that you've looked at what  
9 we've marked as Exhibit 11, the first page of Exhibit 11  
10 is a memo dated August 8th, 1995, and we've just started  
11 talking about you interviewing hostesses. Um, is the time  
12 period that you're talking about where you were  
13 interviewing hostesses sometime before August 8th, 1995?

14 A Yes.

15 Q Okay. Okay. So is it your recollection that  
16 you were interviewing those hostesses sometime between  
17 late June, July, into early August 1995?

18 A Yes.

19 Q Okay. Now, you mentioned that Mr. Sterling  
20 mentioned that he wanted you to grade the hostesses that  
21 you interviewed on a scale of 1 to 10. What was the  
22 highest, 1 or 10?

23 A 10.

24 Q Okay. And did he give you the criteria under  
25 which you were supposed to grade them?



1 A Yes.

2 Q Okay. What were the criteria that he gave  
3 you?

4 A Personality, how good of a body they have, how  
5 pretty of a face, how well they communicate. That's the  
6 best I remember.

7 Q Okay. And were you supposed to give them a  
8 grade on each one of those categories or just an overall 1  
9 to 10 grade?

10 A An overall.

11 Q And was there some sort of a evaluation form  
12 where you would in fact grade them on that scale?

13 A No.

14 Q Okay. How did you -- well, strike that.  
15 Did you in fact grade each of the hostesses  
16 you interviewed based on those criteria?

17 A Somewhat.

18 Q And explain to me when you say somewhat what  
19 that means.

20 A I didn't feel it was absolutely necessary that  
21 they had to have a great body to be a good hostess at one  
22 of his events.

23 Q Okay. So you focused more on the personality  
24 face and communications skills criteria?

25 A Yes, the energy they put forth.

1 Q Okay. And was anyone else other than you  
2 responsible for interviewing these potential hostesses?

3 A Yes.

4 Q Who else?

5 A Occasionally [REDACTED]

6 Q Did you place an ad in a newspaper for the  
7 hostess position?

8 A Yes.

9 Q Okay. And who wrote the ad?

10 A Mr. Sterling and [REDACTED] and myself.

11 Mr. Sterling told us what to say.

12 Q What did he tell you to say in the ad?

13 A Pardon me?

14 Q What did he tell you to say in the ad?

15 A I don't remember exactly right now.

16 Q Can you remember generally what he told you to  
17 say?

18 A Um, Models Wanted. Couple times we used  
19 Sterling Corporation. Sometimes we used Beverly Hills  
20 Entertainment. 42 events in the upcoming year. \$15 an  
21 hour. Bring photo and resume at either -- was it one  
22 o'clock and six o'clock? Something like that, twice a  
23 day.

24 Q And how long did this ad run in whatever  
25 publication you put it in?

1           A           When we started it in June, so from mid or  
2 late June through approximately the end of August '95.

3           Q           Okay. And what publications did you place the  
4 ad in?

5           A           The Drama Log. I believe The Variety, the Los  
6 Angeles Times. Maybe The Hollywood Reporter once or  
7 twice. I'm not sure.

8           Q           Who made the decision on which publications to  
9 put the ad in?

10          A           Mr. Sterling.

11          Q           Okay. So if I understand the way you've  
12 described these ads, there would be certain times on  
13 certain days that anyone interested in this job would just  
14 show up at your office with an application -- with a  
15 resume and photographs of themselves; is that right?

16          A           Yes.

17          Q           Okay. And they would ask to see you when they  
18 came in?

19          A           Whoever was at reception would tell them to  
20 wait downstairs at the lobby and then I would be down at  
21 the time specified in the newspaper or ad.

22          Q           You mean they would wait in the lobby in the  
23 office? Not the lobby down on the street?

24          A           The lobby on the street level.

25          Q           Oh, really, the lobby on the street level?

1           A       Yes.  Occasionally they came upstairs and  
2 Mr. Sterling would yell at them to get back downstairs.

3           Q       Okay.  So they'd just be milling around by the  
4 elevators down in the lobby?

5           A       Yes, exactly.

6           Q       Okay.  Okay.  And then you would -- at the  
7 appointed hour you would then go down and meet with these  
8 women that were applying?

9           A       Yes, however long it took.

10          Q       Okay.  And what -- where did you go with them  
11 after you met them down in the lobby of the building?

12          A       I would meet with them one at a time.

13          Q       Where?

14          A       I would ask them to wait over near the door or  
15 sit down, there's a little stairway, depending on how many  
16 there were.  Sometimes we had big crowds.  And then I  
17 would interview them one by one where the plants are.  I  
18 would sit down with them there or towards the back.

19          Q       Now, you're talking about the lobby on the  
20 street level?

21          A       Yes.

22          Q       Okay.  Okay.  Then after you finished  
23 interviewing each of the women -- well, first, did you  
24 have them fill out an application of any kind?

25          A       Yes.

1 Q Okay. So you took their applications and you  
2 interviewed them. And then once you completed all the  
3 interviews, what would you do next?

4 A They would leave as I interviewed each one.

5 Q Okay. But after you finished interviewing  
6 everybody that was there that particular day, would you  
7 then take the applications and their photographs and  
8 resumes back up to your office?

9 A Yes.

10 Q Okay. And would you then somehow communicate  
11 the results of your interviews that particular day to  
12 Mr. Sterling?

13 A Yes.

14 Q Okay. And how would you go about doing that?

15 A He always came up to me and said comments  
16 like, Any 10's today? Anyone for me? Did you find  
17 someone for me? Did you ask anybody if they wanted to  
18 make some extra money? Don't forget to input it and I  
19 want a report at the end of every day. How many 10's, how  
20 many 9's, how many 8's and throw anybody that's under a  
21 7."

22 Q Throw away anyone that's under a 7?

23 A Yes.

24 Q And did you prepare some type of written  
25 report to him?

1 A Yes.

2 Q On a daily basis when you did the interviews?

3 A If I had time.

4 Q Okay. And what did the format of that report  
5 look like, if it was a normal format?

6 A Just a memorandum, the date, what it was  
7 regarding, um, how many hostesses showed up from which  
8 newspapers, um, and then what number I gave them.

9 Q So you would -- you would have their names and  
10 a number assigned to them as to what your evaluation was  
11 of them?

12 A I didn't put their names on the memos to  
13 Mr. Sterling.

14 Q Oh. So the memos just said, "I interviewed  
15 that five 8's and six 9's," or something like that?

16 A Something like that.

17 Q Okay. And then after you provided those  
18 written reports to Mr. Sterling, did you and he talk about  
19 them?

20 A Sometimes.

21 Q Okay. And what did you talk about?

22 A He would ask me which newspaper we were  
23 getting the most girls from and I would try to assess that  
24 and give him an answer. And he would say, "Did you see  
25 anybody for me?" And I would say, "No." He would say,

1 you know, "Why is it so difficult to find somebody for  
2 me?" I would say, "I just can't ask somebody point blank,  
3 you know, would you be willing to make extra money by  
4 having sex with Donald Sterling?" And he would say,  
5 "Yeah, that's a little difficult, isn't it? But I want  
6 you to think about how to find a way to do that."

7 Q How many hostesses were you looking for to  
8 hire?

9 A If I remember correctly, he requested to have  
10 a hundred on file that were really great.

11 Q Well, when you say "on file," does that mean  
12 that you'd actually hire them or that he would actually  
13 hire them?

14 A He said he would if he had an event that came  
15 up where they needed hostesses.

16 Q Okay. So your instructions from him were to  
17 get together some type of a file that had a hundred really  
18 great potential hostesses?

19 A He changed it a few times.

20 Q Okay.

21 A First he wanted a book of 10's, all 10's, then  
22 it was changed to 9's and 10's. That was Book A, then  
23 there was Book B.

24 Q Okay. And did you create those books for him?

25 A Yes.

1 Q Okay. And what exactly was in the books of  
2 9's and 10's?

3 A The best qualified women to be hostesses at  
4 his events.

5 Q Well, for instance, did you have -- you put  
6 their applications in?

7 A Yes.

8 Q Did you put their photographs in?

9 A Yes.

10 Q Did you put their resumes in?

11 A Yes.

12 Q Okay. And did you put any notes of your  
13 evaluations or interviews of them in?

14 A Yes.

15 Q Okay. Anything else you put in regarding the  
16 women in those notebooks?

17 A Not that I remember, no.

18 Q Okay. And where were those notebooks kept?

19 A On a shelf behind my desk or inside the  
20 sliding cabinet underneath the shelf.

21 Q Behind your desk?

22 A Yes, or on my desk.

23 THE VIDEOGRAPHER: You've got 10 minutes left.

24 MS. ROIT: I think that's all we're going to have  
25 probably, the conclusion of this tape.



1 Q BY MR. DENISTON: Were those notebooks still  
2 in those locations when you left Mr. Sterling's employ in  
3 December of 1995?

4 A As far as I know.

5 Q Okay. Okay. Anything else about the process  
6 of interviewing these hostesses and Mr. Sterling's  
7 involvement in that process that you found to be offensive  
8 or inappropriate that you haven't told me about already?

9 A Did I mention the constant continual  
10 harassment about these women?

11 Q Okay. I don't know exactly what you mean by  
12 the constant continual harassment, so maybe you could  
13 explain that to me.

14 A "Did you find me anyone? How come we don't  
15 have more 10's? Aren't there models out of work?"

16 Q Okay.

17 A "Where do you find the best models?"

18 Q Okay.

19 A Things like that.

20 Q Okay. Was -- these women that you were  
21 interviewing I take it were supposed to ultimately work at  
22 the Clipper games?

23 A Yes.

24 Q And they were supposed to work there for the  
25 upcoming basketball season; correct?

1 A Yes.

2 Q Which normally starts in October or November  
3 if I understand professional basketball schedules; is that  
4 right?

5 A Yes.

6 Q Okay. Were some women ultimately hired to  
7 work as hostesses for that coming season?

8 A I don't know.

9 Q Okay. So you weren't involved in the actual  
10 decision on who to hire or not hire?

11 A Yes, I was.

12 Q Okay. Well, did you ever actually hire any of  
13 these women to work Clipper games that coming season?

14 A No.

15 Q Um, did you hire them for some other purpose?

16 A Yes.

17 Q Okay. What purpose did you hire the women  
18 for?

19 A Mr. Sterling had me invite them to two of his  
20 Malibu white parties in the summer of '95, then there was  
21 a -- what was it called? The draft day party in I think  
22 late June of '95 where they were actually paid hostesses.  
23 And then there was [REDACTED] book signing party, which I  
24 wasn't involved in the beginning of the process of hiring  
25 hostesses, but then eventually got involved in.

1 Q Okay. Well, who actually was involved in  
2 making the decision as to which ones would be selected to  
3 work those events?

4 A For all these events that I've just mentioned?

5 Q Well, if it was -- if it was the same for all  
6 events. If it wasn't, then you can tell me.

7 A Yes for the draft day party, yes for the  
8 invites to the two Malibu parties, which they were not  
9 paid for, and partially for the book signing party in  
10 November of '95.

11 Q Okay. When you say "yes," you're talking  
12 about yes you were involved?

13 A Yes.

14 Q Okay. And who else was involved in the  
15 decision as to which ones to select for those events?

16 A I think [REDACTED] initiated the process for the  
17 November event.

18 Q Okay. Was Mr. Sterling ever involved in the  
19 decision as to which ones to select?

20 A Yes.

21 Q Okay. How would he get involved in doing  
22 that?

23 A He would ask me to see the pictures and the  
24 resumes of the women I had chosen.

25 Q Okay. So you would -- you would go to him

1 with recommendations that I think we should select these  
2 women for this particular event, you would take those to  
3 him and then he would either agree or disagree; is that  
4 how it worked?

5 A He would come over to my desk and say, "Who's  
6 going to be at the draft day party?" And I would page  
7 through and show him. That's how.

8 Q Okay. Okay. So you and -- well, you were the  
9 one that made the first cut, I guess you could say, as to  
10 who was going to be at these events. And then if  
11 Mr. Sterling approved them, you would go ahead and call  
12 them up?

13 A Yes, and [REDACTED] would add girls as well.

14 Q Okay.

15 A And so would Mr. Sterling.

16 Q If you could look at the second page of  
17 Exhibit 11.

18 A (Peruses.)

19 Q Um, my interpretation upon reading this -- and  
20 you can correct me if you have a different  
21 interpretation -- is that this August 20th document was  
22 sent to hostesses that had been selected to work for the  
23 Clippers during their upcoming season. Is that a correct  
24 interpretation?

25 A That's the correct interpretation. It's not

1 necessarily true.

2 Q Okay. How is it not true?

3 A I was led to believe -- I was told to tell  
4 these girls that we had all these events coming up and we  
5 needed hostesses for them and that turned out not to be  
6 true.

7 Q Okay. Okay. In what way didn't it turn out  
8 to be true? You just -- you thought there were events  
9 that were going to take place and they never took place?

10 A The events took place, but he wasn't hiring  
11 any girls.

12 Q I see. Okay. Now, the women at this -- well,  
13 first of all, did you send this document out to a group of  
14 women?

15 A Yes.

16 Q Okay. And were these women paid for coming to  
17 this annual all-star party?

18 A No.

19 Q Okay. And were you at this -- did you attend  
20 the annual all-star party --

21 A Yes.

22 Q -- that this memo refers to?

23 Did you observe Mr. Sterling say or do  
24 anything at that all-star party that you felt was  
25 inappropriate from a sexual standpoint?

1 A Yes.

2 Q Okay. What did you observe?

3 A At times when he would run into me, he would  
4 grab me and say, "Come here, Christine. I want to  
5 introduce you to someone." He would, you know, hold me  
6 sort of on the side and say, "So-and-so, this is  
7 Christine. She has -- she's the supervisor of all these  
8 beautiful hostesses here and she has a book of hundreds of  
9 beautiful women and if you want to look through it, you  
10 know, give her some money and she'll let you look through  
11 it," something to that effect.

12 Q How many times did he do that at that all-star  
13 party?

14 A Several.

15 Q Okay. When you say he grabbed you, you made a  
16 gesture with your right arm. Um, was he putting his arm  
17 over your shoulder when he grabbed you; is that what he  
18 did?

19 A Yeah, like over the shoulder and with his  
20 other hand on my left shoulder and kind of squeezed me  
21 like that.

22 MS. ROIT: Was he behind when he was doing it; is  
23 that what you're describing?

24 THE WITNESS: Sometimes it was like half behind.

25 MR. DENISTON: Okay.

1 THE WITNESS: And sometimes it was right next to me.

2 Q BY MR. DENISTON: All right. Do you recall  
3 the names of any of the people that he introduced you to  
4 when he said these things?

5 A No.

6 Q Okay. Was anyone else present from  
7 Mr. Sterling's business when he did those things, I mean  
8 in your immediate vicinity?

9 A I don't remember.

10 Q Okay. Anything else he did at that all-star  
11 party that you felt was offensive or inappropriate from a  
12 sexual standpoint?

13 A He would gather groups of women, hostesses,  
14 and touch them and take group pictures.

15 Q Um, in what way would he -- did you observe  
16 him touch them?

17 A Grabbing them around the waist, around the  
18 shoulders, hugging women hostesses that he knew from the  
19 past, asking them to get closer to him for the photo.  
20 That's about it that I can remember.

21 THE VIDEOGRAPHER: Two minutes.

22 MR. DENISTON: Okay.

23 Q Was it the touching that you found to be  
24 offensive or inappropriate or the fact that he was having  
25 his picture taken with these hostesses, or was it both?

1           A        It was the way he was touching them and their  
2 reaction.

3           Q        Okay. Okay. Anything else you observed  
4 Mr. Sterling do at this all-star party that you felt was  
5 inappropriate or offensive from a sexual standpoint?

6           A        Not that I can think of right now.

7           MR. DENISTON: Okay. Okay. Why don't we go off the  
8 record for the moment?

9           THE VIDEOGRAPHER: Off the video record at 4:16.

10                   (Discussion held off the record.)

11           THE VIDEOGRAPHER: Back on the video record at 4:16.

12           MR. DENISTON: Okay. Counsel have agreed, as I  
13 understand it, to the same stipulation that we entered  
14 into with respect to Volumes I and II of that -- of this  
15 deposition; correct?

16           MS. ROIT: So stipulated.

17           MR. DENISTON: Okay. And we will resume tomorrow at  
18 12:00 p.m. Thank you very much.

19           MS. ROIT: See you then. Thank you.

20           THE VIDEOGRAPHER: Off the video record, end of  
21 Volume III, Tape No. 2, at 4:16.

22                   (Whereupon the following  
23 stipulation was entered into by  
24 and between counsel from the  
25 deposition of Christine Jaksy,



1 was worded?

2 A Just basically what I told you.

3 Q Okay. You don't have anything further to add?

4 A Not right at this moment.

5 Q All right. Did [REDACTED] explain to you how he  
6 knew that [REDACTED] had received additional monetary  
7 compensation and benefits from Mr. Sterling for sex?

8 A I don't remember the exact wording, but he  
9 said he liked -- he -- he said that [REDACTED] liked Sterling  
10 coming on to her and that, you know, she had a lot of nice  
11 clothes and something about compensation, but I don't  
12 remember the exact wording.

13 Q All right. All right. What sexual overtures  
14 had [REDACTED] acquiesced to and received additional  
15 monetary compensation and benefits?

16 A I was told she had an expense account at some  
17 clothing store and that she was flown to different cities  
18 to meet Mr. Sterling.

19 Q Who told you that?

20 A [REDACTED] and [REDACTED].

21 Q Anyone tell you that she had acquiesced to  
22 sexual overtures from Mr. Sterling?

23 A You mean did she give in voluntarily?

24 Q Either voluntarily or involuntarily. I don't  
25 know how she acquiesced, if she acquiesced.

1           A       I was told that she gave in to his sexual  
2 propositions and was compensated well.

3           Q       Who told you she gave in to his sexual  
4 propositions?

5           A       ██████████

6           Q       Okay. Did they explain to you how they knew  
7 that?

8           A       Uh, well, ██████████ was in accounts payable, so...

9           MS. ROIT: All he's asking basically is did they  
10 tell you how they knew.

11          THE WITNESS: Yes.

12          Q       BY MR. DENISTON: Okay. And what did they  
13 tell you about how they knew?

14          A       ██████████ saw some things in accounting. That's  
15 all I remember.

16          Q       What did she see in accounting that indicated  
17 that ██████████ had given in to Mr. Sterling's sexual  
18 requests?

19          MS. ROIT: Objection; asks for speculation.

20                 You can answer only what you know or what you  
21 were told.

22          THE WITNESS: Just how the money goes out, like  
23 checks that were made out or things like that.

24          Q       BY MR. DENISTON: Are you saying they saw  
25 checks made out to ██████████

1 A No. It was some kind of document or documents  
2 that she saw in accounts payable.

3 Q This was [REDACTED] --

4 A Yes, mm-hmm.

5 Q -- that saw them?

6 Okay. Did they give you any other reasons why  
7 they knew [REDACTED] had received additional monetary  
8 compensation and benefits for giving in to Mr. Sterling's  
9 sexual overtures?

10 A I don't remember at the moment.

11 Q Okay. Okay. How did you learn that [REDACTED]  
12 [REDACTED] has acquiesced to Mr. Sterling's sexual overtures  
13 and had received additional monetary compensation and  
14 benefits?

15 A Actually I don't know if she ever gave in, but  
16 I know she was propositioned. I was told.

17 Q And who told you she was propositioned?

18 A An acquaintance.

19 Q Who?

20 THE WITNESS: Do I have to give the name?

21 MS. ROIT: Yes.

22 THE WITNESS: [REDACTED].

23 Q BY MR. DENISTON: Do you know his last name?

24 A [REDACTED].

25 Q And when did he tell you that?

1 A Sometime around early summer of '95.

2 Q And did he give you any specifics about how  
3 Annie Lucas was allegedly propositioned by Mr. Sterling?

4 A Yes.

5 Q What did he tell you?

6 A When he found out that I worked for Donald  
7 Sterling, he asked me if Donald Sterling had dropped his  
8 pants yet and I said, "No." And he said, "Can you keep a  
9 secret?"

10 MS. ROIT: And you said yes?

11 THE WITNESS: Yes. This is not good. And --

12 MS. ROIT: You tell him they forced you to say it.

13 Okay?

14 THE WITNESS: Okay.

15 MS. ROIT: Okay.

16 THE WITNESS: And he said Donald Sterling always had  
17 a thing for my ex-girlfriend, Annie Lucas, and she was out  
18 of work as an actress and Donald Sterling asked her to  
19 come and work for him. And he said that after a couple of  
20 years, two or three years of working for Donald Sterling,  
21 Donald Sterling gave her an ultimatum to engage in sexual  
22 relations with him or lose your job. And then he told me  
23 that she had it on a tape recorder and that she went to a  
24 lawyer and he doesn't know what happened after that.  
25 That's what he said.

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1 Q BY MR. DENISTON: Okay. Did [REDACTED] work  
2 for Donald Sterling while you worked there?

3 A No.

4 Q Did [REDACTED] work for Donald Sterling while  
5 you worked there?

6 A No.

7 Q Did [REDACTED] work for Donald Sterling while  
8 you worked there?

9 A It's hard to say. I saw her in the office  
10 once, but she was not an employee.

11 Q Okay. So as far as you know, all these  
12 incidents with [REDACTED]  
13 happened before you started working for Mr. Sterling; is  
14 that right?

15 A Yes.

16 Q All right. Did you -- did you yourself ever  
17 talk to any of those three women and seek to confirm  
18 whether or not what you had been told about them and  
19 Donald Sterling was true?

20 A No.

21 Q Okay. Now, also in your allegation in  
22 Paragraph 15 of the complaint is the statement that:

23 "Women who objected to resisted  
24 Mr. Sterling's advances were forced from their  
25 employment."

1           Okay. What women are being referred to there,  
2 if you know?

3           A           [REDACTED]

4           MS. ROIT: And, again, you're testifying to what you  
5 heard?

6           THE WITNESS: Yes.

7           MS. ROIT: Okay.

8           THE WITNESS: Are we talking sexually only?

9           Q           BY MR. DENISTON: Well, we're talking about  
10 what -- which women objected to or resisted his sexual  
11 advances and were then forced from their employment.  
12 That's what we're talking about.

13          A           I know that [REDACTED] had some kind of  
14 problems with him in the sexual area, but I don't know the  
15 specifics.

16          Q           Okay. Any other woman?

17          A           Well, I saw it happening to myself.

18                   (Mr. Lenkov returns to the  
19 deposition room.)

20          Q           BY MR. DENISTON: Okay, but other than  
21 yourself.

22          A           I can't think right in the moment of anybody  
23 else.

24          Q           Okay. Um, who told you that [REDACTED] had  
25 objected to or resisted Mr. Sterling's sexual advances and