

<p style="text-align: right;">1</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF COLUMBIA</p> <p>3</p> <p>4 WADE ROBERTSON,)</p> <p>5)</p> <p>6 Plaintiff,)</p> <p>7) Civil Action</p> <p>8 v.)</p> <p>9) No. 1:09-cv-1642</p> <p>10 WILLIAM C. CARTINHOURL, JR.,)</p> <p>11)</p> <p>12 Defendant.)</p> <p>13</p> <p>14 VOLUME 1</p> <p>15 Videotape Deposition of WILLIAM C. CARTINHOURL, JR.</p> <p>16 Rockville, Maryland</p> <p>17 Monday, January 31, 2011</p> <p>18 11:00 a.m.</p> <p>19</p> <p>20 Job No: 1-191838</p> <p>21 Pages 1 - 95</p> <p>22 Reported by: Christie Valcich, CSR</p> <p>Videographer: Terry Michael King</p>	<p style="text-align: right;">3</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFF:</p> <p>4 EDWARD N. GRIFFIN, ESQUIRE</p> <p>5 Griffin Whitaker</p> <p>6 7474 Greenway Center Drive, Suite 550</p> <p>7 Greenbelt, Maryland 20770</p> <p>8 (301) 513-5082</p> <p>9</p> <p>10</p> <p>11</p> <p>12 ON BEHALF OF THE DEFENDANT:</p> <p>13 PATRICK J. KEARNEY, ESQUIRE</p> <p>14 Selzer, Gurvitch, Rabin & Obecny, Chartered</p> <p>15 4416 East-West Highway, Fourth Floor</p> <p>16 Bethesda, Maryland 20814</p> <p>17 (301) 986-9600</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
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<p style="text-align: right;">2</p> <p>1 Deposition of WILLIAM C. CARTINHOURL, JR.,</p> <p>2 held at the offices of:</p> <p>3</p> <p>4 Montgomery County Circuit Court</p> <p>5 50 Maryland Avenue</p> <p>6 Rockville, Maryland 20850</p> <p>7</p> <p>8 Pursuant to notice, before Christie</p> <p>9 Valcich, Certified Shorthand Reporter and Notary</p> <p>10 Public for the State of Maryland.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">4</p> <p>1 CONTENTS</p> <p>2 EXAMINATION OF WILLIAM C. CARTINHOURL, JR. PAGE</p> <p>3 By Mr. Kearney 6</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 EXHIBITS</p> <p>11 (None)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
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1 PROCEEDINGS

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3 THE VIDEOGRAPHER: Here begins Videotape No. 1

4 in the deposition of William Cartinhour, in the matter

5 of Wade Robertson versus William Cartinhour in the US

6 District Court for the District of Columbia,

7 Case No. 1:09-cv-1642.

8 Today's date is January 31st, 2011. The

9 time on the video monitor is 11:01 a.m.

10 The video operator today is Terry Michael

11 King of Merrill Corporation. This video

12 deposition is taking place at the Montgomery

13 County Circuit Court, 50 Maryland Avenue,

14 Rockville, Maryland.

15 Counsel please voice identify yourselves

16 and state whom you represent.

17 MR. KEARNEY: Patrick Kearney on behalf of

18 William J. Cartinhour, Jr.

19 THE WITNESS: William C.

20 MR. KEARNEY: William C. Cartinhour, Jr.

21 MR. GRIFFIN: Edward Griffin on behalf of Wade

22 Robertson.

6

1 THE VIDEOGRAPHER: The court reporter today is

2 Christie Valcich of Merrill Corporation.

3 Would the reporter swear in the witness.

4

5 WILLIAM C. CARTINHOURL, JR.

6 having been duly sworn, testified as follows:

7

8 EXAMINATION

9 BY MR. KEARNEY:

10 Q Please state your full name.

11 A **William C. Cartinhour, Jr.**

12 Q Where do you live, sir?

13 A **I live at [REDACTED] --**

14 Q How old are you? I'm sorry, you weren't

15 finished, [REDACTED].

16 A **Rockville, Maryland [REDACTED]**

17 Q How old are you?

18 A **83-1/2.**

19 Q Can you describe any medical conditions

20 you have?

21 A **I have neuropathy of the legs, and I have**

22 **another bone problem -- two problems with the**

7

1 **legs.**

2 Q Anything else?

3 A **I have I think chronic problem with**

4 **esophageal spasms and atrial fibrillation, and**

5 **that's mainly it.**

6 Q Do you have any phobias, anxieties?

7 A **Not remarkable. Phobias -- well, I have**

8 **phobia -- stage fright, that would be called a**

9 **phobia.**

10 Q What is stage fright?

11 A **It is the most common phobia in the United**

12 **States. It just involves appearing in public,**

13 **talking.**

14 Q What kind of medication do you take?

15 A **I take the same old thing, clonazepam, and**

16 **that's the only one I take regularly.**

17 Q Does it affect your memory?

18 A **My memory is okay, you know, except for**

19 **single words I have like sometimes trouble. But,**

20 **I mean, I make sentences fine but sometimes you**

21 **know a noun I forget. I was trying to think of**

22 **au pair yesterday and I couldn't pull it up. That**

8

1 **would be an example of that.**

2 Q Why are you wearing a coat right now?

3 A **Hypothermia -- yeah. Thank you for the**

4 **hint. I have chronic hypothermia, and my room is**

5 **like for you 72, for me 82.4. You wouldn't want**

6 **to be visiting me.**

7 Q Do you own a suit?

8 A **Well, yeah, I do own a suit. The last**

9 **time I wore it was when I got my passport many**

10 **years ago. I just -- you know, like today, I have**

11 **three layers of coats.**

12 Q Have you ever been married?

13 A **No.**

14 Q Do you have any children?

15 A **No.**

16 Q Are you in contact currently with any

17 family members, cousins?

18 A **No.**

19 Q Can you describe your educational

20 background?

21 A **I had college about five-eighths of the way**

22 **through Princeton and then I've had also some**