

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO - NORTH DISTRICT

BRUCE J. KELMAN, GLOBALTOX, INC.,)
Plaintiff,)
vs.)Case No. GIN044539
SHARON KRAMER, and DOES 1 through)
20, inclusive,)
Defendants.)
_____)

DEPOSITION OF BRUCE J. KELMAN
Volume II (Pages 202 - 359)
Los Angeles, California
July 22, 2008

Reported by:

4 industry bias?

10:31:54 5 A Same answer.

6 Q Do you know if it has a pro-builder bias?

7 A Same answer.

8 Q And you've testified on a number of

9 occasions that -- that Veritox was paid \$40,000 to

10:32:12 10 prepare the work-for-hire that you talked about a

11 moment ago in the Manhattan Institute report;

12 correct?

13 A I have.

14 Q And you've since changed that testimony to

10:32:22 15 indicate you now believe it was \$25,000; correct?

16 A No, I haven't changed the prior testimony.

17 That's what I believed at the time. When we looked

18 at the actual checks, it came to 25,000. So

19 apparently I misremembered the 40,000.

10:32:34 20 Q Can you think of any particular reason why

21 you thought that number was 40,000 at one point?

22 A That's what I thought it was.

23 Q Do you know who Paul Howard is?

24 A He was somebody at the Manhattan

10:32:56 25 Institute.