

R E C R O S S

RECROSS EXAMINATION:

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2
3 Q. Mr. Padin, if you could look at
4 Defendant's "B"?

5 Could you look at the very top in
6 the right hand corner.

7 Is there a date in there?

8 A. It says 11-16-08.

9 Q. And, if that was done on 11-16-08
10 is there a possibility that it could have
11 been in your brief case?

12 A. Well, I know that these notes, I
13 keep all of my notes together and they were
14 in my brief case at some point in time, I
15 know that.

16 Q. And, is that entire document as it
17 is presented in your hand is that a document
18 that you constructed?

19 Is that your document or is that
20 just your hand written notes on the very
21 top?

22 A. This is a document that was
23 created by you with a copy of my attorney
24 client notes that I had kept which were
25 privileged.