

# Exhibit 1:

# Saul Simington Deposition

page 1

1                                   IN THE SUPERIOR COURT  
2                                   FOR THE DISTRICT OF COLUMBIA  
3 -----X  
4 MARLIN GODFREY, et al.,                                   :  
5                                   Plaintiffs                                   :  
6                                   v.   :  
7 ALLEN IVERSON,   :  
8                                   Defendant   :  
9 -----X

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Deposition of SAUL KEITH SIMINGTON  
Washington, D.C.  
Thursday, June 1, 2006  
11:06 a.m.

Job No.: 1-79827  
Pages 1 - 39  
Reported by: Lynn Schindler

page 6

1 P R O C E E D I N G S

2 Whereupon,

3 SAUL KEITH SIMINGTON,

4 being first duly sworn to testify to the truth, the  
5 whole truth, and nothing but the truth, was examined  
6 and testified as follows:

7 EXAMINATION BY COUNSEL FOR THE PLAINTIFFS

8 BY MS. MORAN:

9 Q Please state your full name and address for  
10 the record.

11 A Saul Keith Simington.

12 Q Okay.

13 A 2828 Tenth Street, Northeast, Washington,  
14 D.C.

15 Q Okay. Did you have an occasion to be --  
16 well, let me first say, I'm Stephanie Moran and this  
17 is Gregory Lattimer. We represent the plaintiffs  
18 Marlin Godfrey and Dave Anthony Katrell (phonetic) in  
19 a lawsuit against Allen Iverson, Jason Kane and  
20 Gregory Iverson. I'm just asking you a few questions  
21 today, that are relevant to the lawsuit. If you need  
22 to take a break at any time, just let me know, and

page 7

1 we'll take a break. Did have you an occasion to be  
2 present at the Eyebar in July of last year?

3 A Uh-huh.

4 Q You have to say yes or no for the reporter.

5 A Yes.

6 Q Okay. And do you know if that was July 19,  
7 2005?

8 A I'm not for sure of the exact date.

9 Q Okay. And did anything unusual happen while  
10 you were there?

11 A Yeah. I witnessed a fight that broke out.  
12 When I came into the club, I went to the back area  
13 where the VIP tables were. I spoke to Tony. Tony,  
14 you know, was sitting in the middle section. You  
15 know, a lot of people tend to stand up on the couches  
16 and stuff, and I spoke to him briefly. I guess maybe  
17 like five minutes later, Iverson came in with, you  
18 know, bodyguard, couple of people, and like two girls.

19 Q Okay. Is that Allen Iverson?

20 A Yeah.

21 Q Okay. Well, do you know what time you got  
22 to the club that night?

page 8

1 A I would say right about 12:00, maybe.

2 Q Okay. And do you know how long after you  
3 arrived that Mr. Iverson, Allen Iverson arrived?

4 A Probably like five minutes, ten at the most.

5 Q All right. And now, you're describing that  
6 Tony Katrell was at a -- did you say at a middle  
7 table?

8 A Uh-huh.

9 Q Okay. And so when Mr. Iverson and his  
10 entourage came in, where were they in relation to  
11 where Mr. Katrell was?

12 A Well, his bodyguards and stuff they walked  
13 him straight back to the very end until they was  
14 trying to get the table area situated.

15 Q Okay.

16 A At that time, he was trying to get --  
17 there's only three of the VIP areas.

18 Q Okay. So three tables?

19 A Yes. It was like three tables, but it's  
20 couches around the tables and stuff. Tony was in the  
21 middle one. So Iverson and them was trying to obtain  
22 two of the tables.

page 9

1 Q Okay. So if Tony was in the middle,  
2 Mr. Iverson, Allen Iverson was trying to obtain, you  
3 said two of the tables? Would they be tables on the  
4 opposite -- each on the opposite side of Tony?

5 A Well, that was the problem. He didn't want  
6 to be split up. He wanted both tables.

7 Q I see. Okay.

8 A So that was going to have to make Tony and  
9 them move.

10 Q Okay.

11 A And his people that was with him.

12 Q All right. And so did that happen? Did  
13 Mr. Katrell move?

14 A Uh-huh, yeah. Eventually they moved. It  
15 was a little, you know, bickering that went on before  
16 Tony and them moved. Tony didn't have any problem  
17 moving. I think the bodyguards was a little forceful  
18 with the moving situation.

19 Q Okay. And when you said there was  
20 bickering, who was there bickering between?

21 A Bodyguard and Marlin.

22 Q Okay. Could you hear what was being said?

page 10

1 A No, I couldn't.

2 Q Okay. How did you know there was bickering?

3 A Because you could just tell.

4 Q From the body language?

5 A Yes.

6 Q Okay. At that point in time, did you see

7 whether Marlin or the bodyguard had any physical

8 contact with each other?

9 A No, not at that time.

10 Q Okay. And so at some point, so then

11 Mr. Katrell and his --

12 A They moved down one section to give Iverson

13 the two sections.

14 Q All right. And so then did Mr. Iverson take

15 the two sections?

16 A Well, just as they moved down, the two

17 sections were available. By that time the bouncers

18 had come, because they thought something was going to

19 happen.

20 Q The bouncers of the club? Is that what

21 you're referring to?

22 A Yeah. Uh-huh.

page 11

1 Q Okay. And do you know either of their  
2 names?

3 A Curtis. I don't know his last name.

4 Q Okay. And do you know any of the other  
5 bouncers' names?

6 A And Nightmare was the nickname.

7 Q Okay. So who did they come over to?

8 A They came over to settle what was going on.

9 Q Okay. And did you see who they went -- who  
10 they approached?

11 A Well, they approached the bodyguards to talk  
12 to them and to find out, you know, what was the  
13 problem was, and stuff.

14 Q And this is -- so the bouncers, Curtis and  
15 Nightmare, approached Mr. Iverson's bodyguards?

16 A Uh-huh.

17 Q Do you know any of their names? The  
18 bodyguards?

19 A Big guy, they just call him J. Everybody  
20 calls him J.

21 Q Okay. And do you know any of the other  
22 bodyguards' names?

page 12

1 MR. TUCKER: Objection.

2 A No.

3 BY MS. MORAN:

4 Q Okay. And so who did you see -- so you saw  
5 Curtis and Nightmare go up to the gentleman referred  
6 to as Big J?

7 A Yeah.

8 Q Okay. Could you hear what was being said?

9 A No.

10 Q Okay. And where was Mr. Iverson at this  
11 time?

12 A He was still standing up against the wall  
13 behind the bodyguards.

14 Q And I want to be clear we're referring to  
15 Allen Iverson.

16 A Right.

17 Q Okay. I'm just clarifying since Gregory  
18 Iverson is also a defendant. You said he was standing  
19 next to the bodyguards.

20 A He was standing behind them.

21 Q Okay. You're saying behind. All right.

22 MR. TUCKER: Objection.

page 13

1 BY MS. MORAN:

2 Q And then what happened next?

3 A And then the bodyguard reached out and  
4 pushed the bouncer.

5 Q Do you know which bodyguard?

6 A Curtis -- I mean, the guy J reached out, and  
7 pushed Curtis to like back him up.

8 Q Okay. And did you see whether -- what was  
9 the result of Big J pushing Curtis?

10 A Once he pushed him, the little sit-down sofa  
11 chairs was right behind his legs, so it looked a  
12 little worse than what it was really was. He flipped  
13 over the chair. Once he flipped over the chair then  
14 --

15 Q Curtis flipped over the chair?

16 A Uh-huh.

17 Q Okay. And flipped over on his back or on  
18 his stomach?

19 A Flipped over on his back.

20 Q Okay. So his arms and legs would have been  
21 straight up or facing upward?

22 A Yeah.

page 14

1 Q All right. And so and then what happened  
2 next?

3 A Then it just broke out into a fight.

4 Q Okay. And did you see -- could you see at  
5 that point who was hitting whom?

6 A Yeah. Immediately, the guy, J, the  
7 bodyguard had grabbed one of the juice bottles, the  
8 carafe bottles that they put the cranberry and orange  
9 juice in, and struck Marlin.

10 Q Okay. Did you see where he struck Marlin,  
11 what part of the body?

12 A He hit him in the head several times until  
13 Marlin went down, and then they was like right beside  
14 me, arm distance away.

15 Q All right. So and you're saying Big J hit  
16 Marlin on the head with the juice bottle?

17 A Uh-huh.

18 Q And you said he hit him more than once?

19 A Yeah, he hit him several times until it  
20 finally broke.

21 Q The juice bottle actually broke?

22 A Yeah.

page 15

1 Q Okay. Did you see anybody else hitting  
2 Marlin?

3 A Once he fell down, then, you know, I just  
4 seen people kicking. I couldn't tell, you know, who  
5 was actually doing the kicking and stuff.

6 Q Okay. Do you know where Curtis was at this  
7 point?

8 A No.

9 Q Okay. You didn't see him at this point?

10 A Uh-uh. It was just are big mess going on.  
11 I just -- Marlin and bodyguard J was like right next  
12 to me.

13 Q All right. But you did see other people hit  
14 Marlin you said?

15 MR. TUCKER: Objection?

16 A Uh-huh.

17 BY MS. MORAN:

18 Q Is that a yes? Just for her. She has to  
19 take yes or no?

20 A Yes.

21 MR. TUCKER: Just for one second. Could I  
22 just ask you to pause for just a split second after

page 16

1 she asks the question so that I might be able to  
2 object and then you can go ahead.

3 THE WITNESS: No problem.

4 BY MS. MORAN:

5 Q Okay. All right. And then what happened  
6 next?

7 A Then after that -- after that, I think, Tony  
8 hadn't realized what was really going on, and then,  
9 you know, it kind of cleared for a second, and he seen  
10 that that was Marlin down there, then he came down to  
11 like pull people off of Marlin, and then I seen one of  
12 the bodyguards, I don't know this particular guy,  
13 throw Tony back towards the couch area. Then I just  
14 stepped out of the whole area by then.

15 Q Okay. And do you know where Mr. Iverson was  
16 when all of this was going on? Mr. Allen Iverson?

17 A I assume he was still against the wall. I  
18 couldn't tell after that. You know, after they broke  
19 out into a big fight, I didn't really see where he was  
20 at.

21 Q Okay. At the point when you said that Big J  
22 was hitting Marlin, do you know where Mr. Iverson was

page 17

1 at that point?

2 A No.

3 Q Okay. All right. Did you see anyone else  
4 hit or kick or do anything to Mr. Katrell?

5 A I just -- I seen one of the bodyguards throw  
6 him back up against the couch, and once they moved  
7 over towards him to start fighting, I just stepped out  
8 of that whole area.

9 Q Okay. And where did you go?

10 A I just moved down, because at first I don't  
11 never like to, when I'm in a club, run from the fight  
12 or anything like that. No, I kind of like pay  
13 attention to what's going on first, and you know, but  
14 after the incident with Marlin and J or whatever, it  
15 was just like right next to me, so after they kind of  
16 got out of hand even more, I just took a couple steps  
17 back and went back towards the bar area.

18 Q Okay. And what did -- what was Marlin doing  
19 when he was being hit in the head with the juice  
20 bottle?

21 MR. TUCKER: Objection.

22 A Out.

page 18

1 BY MS. MORAN:

2 Q Out? Do you know if he was unconscious?

3 A I couldn't tell you. He was just laying  
4 there.

5 Q Okay. Did you see any blood or anything?

6 A I don't even know.

7 Q Okay. All right. And then what happened  
8 after you went back by the bar area?

9 A You know, some more bouncers from the club  
10 came. They went back, and, I guess, tried to separate  
11 what was going on. The next thing I know, maybe a  
12 couple minutes later, you know, they rounded Iverson  
13 and his bodyguards, rounded their crew up. Well, they  
14 actually, this one guy that was there, I don't know  
15 who he was, a light-skinned guy who was with Tony and  
16 them, was -- he was one of the guys, I guess, that was  
17 talking to one of the girls that came with Iverson.  
18 So they was trying to figure out -- the bodyguard was  
19 trying to figure out who was talking to the girl, and  
20 trying to get some directions, I guess from, you know,  
21 he was coming up from behind the bodyguard, so it was  
22 either Iverson or whoever was with Iverson wasn't

page 19

1 happy about the guy talking to the girls, whatever, so  
2 bodyguard kept on saying who, which one, which one,  
3 which one. And then they finally pointed at the  
4 light-skinned dude, this little light-skinned dude,  
5 little dude, and when they pointed at him, bodyguard  
6 went up and just hit him.

7 Q Do you know which bodyguard hit him?

8 A I don't know the name.

9 Q Do you know what he looked like?

10 A Short guy, real built, bald-headed.

11 Q Do you know how much he looked like he  
12 weighed?

13 A Nice amount, I would say. 300 area.

14 Q Okay. And what was his skin complexion?

15 A I think about my complexion, maybe a little  
16 lighter.

17 Q Okay. So brown skin?

18 A Yeah, bald-headed.

19 Q Okay. And he hit someone who was with  
20 Mr. Katrell?

21 A Uh-huh.

22 Q Okay. Now, how did you -- did you overhear

page 20

1 any words being used? How did you know that they were  
2 trying to figure out which individual, which male  
3 individual was speaking to a girl who had come with  
4 Mr. Allen Iverson?

5 A They kept on saying who was talking to?  
6 Who? Which one, which one, which one? And they kept  
7 yelling like they wanted to find out who the guy was.  
8 And so, you know, at that time, everybody was kind of  
9 looking around because the fight had kind of, you  
10 know, diminished, and then the bodyguard was just kind  
11 of like looking to beat somebody up, whoever they were  
12 getting ready to point out. And, you know, he pointed  
13 the little guy out, and they just sucker punched the  
14 little guy.

15 Q Was Big J still there at that time?

16 MR. TUCKER: Objection.

17 A Yeah, he was still there.

18 BY MS. MORAN:

19 Q Okay. And do you know where Mr. Allen  
20 Iverson was?

21 A He was still against that back wall area.

22 Q Okay. So he was still present. So then

page 21

1 what happened after the guy -- you don't know the  
2 individual's name who was with Tony, Mr. Katrell?

3 A No, I never seen him before.

4 Q Okay. What happened next after he was hit?

5 A After he was hit, then they rounded their  
6 crew up and just like put their hands on each other  
7 shoulders, kind of like laughed about things, and just  
8 went on out the club.

9 Q And did you see whether Mr. Allen Iverson  
10 exited?

11 A Yeah, they went out the front.

12 Q Okay. Did you see who Mr. Allen Iverson  
13 left with?

14 A The same people he came with, the two girls,  
15 guy or two, and then a couple bodyguard guys.

16 Q Okay. Now, what makes you say that these  
17 guys that were with Mr. Allen Iverson were bodyguards?

18 A I shoot all the celebrity events. I shot a  
19 lot of events. I know the different bodyguards that  
20 be with different athletes and stuff.

21 Q Okay. And so you've had occasion to shoot  
22 events involving Mr. Allen Iverson before?

page 22

1 A Yeah.

2 Q Okay. And have you seen any of the guys  
3 that you saw there that night with Mr. Allen Iverson  
4 previously?

5 A Yeah. J.

6 Q You saw J?

7 A Uh-huh.

8 Q Okay. And when you've seen him before, have  
9 you seen him, J act in any manner that would let you  
10 know he was Mr. Allen Iverson's bodyguard?

11 MR. TUCKER: Objection.

12 A Yeah. Definitely.

13 BY MS. MORAN:

14 Q Okay. Can you describe what things you have  
15 observed, any actions or mannerisms you have observed  
16 of J that led you to believe he was Mr. Allen  
17 Iverson's bodyguard?

18 A They pull in the car together in front of  
19 the club. And they get out, and, you know, he makes  
20 sure the, you know, the doorway is going to be clear,  
21 everything, they got full access. And then, you know,  
22 Iverson gets out and he walks him in the club. And he

page 23

1 sits with him.

2 Q Okay.

3 A That's the short guy right there.

4 Q Okay. So you're looking at -- I showed you  
5 what's going to be marked as Exhibit No. 1.

6 (Simington Deposition Exhibit Number 1 was  
7 marked for identification and retained by counsel.)

8 BY MS. MORAN:

9 Q Does it have a number at the top of the  
10 page?

11 A Uh-huh.

12 Q What's the number?

13 A 1.

14 Q All right. And you're identifying someone  
15 in that picture you recognize?

16 A Uh-huh.

17 Q Who do you recognize?

18 A This short guy that -- that was with him.  
19 That look like J to me, him turning around.

20 Q All right. So that the record is clear, the  
21 person that you're pointing to is a short guy in  
22 Exhibit No. 1. What color shirt does he have on?

page 24

1 A White.

2 Q All right. And then you're saying the other  
3 individual in that picture looks like J to you?

4 A Uh-huh.

5 Q And what does that person in the picture  
6 have on?

7 A Black do-rag and a black T-shirt.

8 Q Okay. Have you ever seen that picture  
9 before?

10 A No.

11 Q Okay. And if we can turn to then Exhibit 2.

12 (Simington Deposition Exhibit Number 2 was  
13 marked for identification and retained by counsel.)

14 BY MS. MORAN:

15 Q Okay. Do you recognize anyone in that  
16 picture?

17 A Same people.

18 Q The same people in picture No. 1?

19 A Uh-huh.

20 Q And so can you -- so you see the guy you  
21 referred to as J in picture No. 2?

22 A Right here.

page 25

1 Q Okay. I can't see across the table. What  
2 color shirt does he have on?

3 A Black.

4 Q Okay. And does he have anything on his  
5 head, a hat or anything?

6 A Yeah, a black do-rag.

7 Q All right. And so you can turn to Exhibit  
8 No. 3.

9 (Simington Deposition Exhibit Number 3 was  
10 marked for identification and retained by counsel.)

11 BY MS. MORAN:

12 Q Do you recognize anyone in Exhibit No. 3?

13 A No.

14 Q No, okay. If we can turn to Exhibit No. 4.

15 (Simington Deposition Exhibit Number 4 was  
16 marked for identification and retained by counsel.)

17 BY MS. MORAN:

18 Q Do you recognize anyone in Exhibit No. 4?

19 Is that a no?

20 A No.

21 (Simington Deposition Exhibit Number 5 was  
22 marked for identification and retained by counsel.)

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1 BY MS. MORAN:

2 Q Okay. Exhibit No. 5? Do you recognize  
3 anyone in Exhibit No. 5?

4 A Yeah. That's J.

5 Q Okay. And again what color shirt does he  
6 have on?

7 A Black. Black do-rag.

8 Q All right. Great. And then turn to picture  
9 No. 6.

10 (Simington Deposition Exhibit Number 6 was  
11 marked for identification and retained by counsel.)

12 BY MS. MORAN:

13 Q Okay. Do you know -- recognize anyone in  
14 picture No. 6?

15 A I've seen him around, this particular guy,  
16 working at clubs and stuff.

17 Q Okay. And can you describe what the person  
18 you just referred to, what type of shirt he has on?

19 A Black cutoff T-shirt.

20 Q Okay. Cut off at the stomach area or the  
21 arms or where?

22 A Arm.

page 29

1 picture and Exhibit No. 10, do you recognize anyone in  
2 that picture?

3 A Yeah. J.

4 Q Okay. And J still has on the black cutoff  
5 shirt and the black do-rag?

6 A Uh-huh.

7 Q Is that yes?

8 A Yes.

9 Q Okay. And you said you recognize the other  
10 guy also in the picture?

11 MR. TUCKER: Objection.

12 A Yes. Short guy again.

13 BY MS. MORAN:

14 Q Okay. And so the guy you're referring to as  
15 J in this exhibits 1 through 10 is the same J you saw  
16 in the club at the Eyebar?

17 A Yes.

18 Q And he's the same J that you saw hitting  
19 Marlin?

20 A I've seen him at the Super Bowls, you know,  
21 everywhere.

22 Q Okay. I'm going to show you what's going to

page 30

1 be marked as Exhibit No. 11.

2 (Simington Deposition Exhibit Number 11 was  
3 marked for identification and retained by counsel.)

4 BY MS. MORAN:

5 Q Okay. And have you seen that document  
6 before? Is that a yes?

7 A Yes.

8 Q And you've read that document?

9 A Yes.

10 Q And that's an affidavit?

11 A Yes.

12 Q Of yourself? And all the statements in  
13 there are true and correct?

14 A Yes.

15 Q And that's signature on the second page?

16 A Yes.

17 Q Okay.

18 MS. MORAN: I don't have any further  
19 questions.

20 EXAMINATION BY COUNSEL FOR THE DEFENDANT

21 BY MR. TUCKER:

22 Q Okay. Mr. Simington, my name is Matt

page 31

1 Tucker. I'm an attorney for Mr. Allen Iverson, the  
2 defendant in this case. Since you've already begun  
3 the deposition, you're familiar with the ground rules  
4 and how we're going to proceed. I'll try to be as  
5 quick as possible so we can get you out of here.

6 What do you do for a living, Mr. Simington?

7 A Photographer.

8 Q And how long have you been doing that?

9 A 20 years.

10 Q Have you ever been arrested?

11 MS. MORAN: Objection?

12 A Yes.

13 BY MR. TUCKER:

14 Q Have you ever been convicted of a crime?

15 MS. MORAN: Objection.

16 A No.

17 BY MR. TUCKER:

18 Q That was a no; right?

19 A Yeah.

20 Q All right. Let's move to the evening in  
21 question. On July 19 into July 20, 2005. I just want  
22 to confirm, I believe you stated that you arrived at

page 32

1 the Eyebars around midnight; is that correct?

2 A Yeah.

3 Q And I believe you stated that Mr. Iverson  
4 arrived five to ten minutes later' is that correct?

5 A (Nods head.)

6 Q And did you notice Iverson, Mr. Allen  
7 Iverson when he arrived that evening?

8 A Yes.

9 Q As he entered the Eyebars?

10 A Yes.

11 Q Do you have a personal relationship with  
12 Marlin Godfrey?

13 MS. MORAN: Objection.

14 BY MR. TUCKER:

15 Q Let me clarify that. Do you personally know  
16 Marlin Godfrey?

17 MS. MORAN: Objection.

18 A I know him a little bit now, but I didn't  
19 know who he was or anything before.

20 BY MR. TUCKER:

21 Q What brought you to the Eyebars that evening?

22 A I just got through shooting pictures of

page 33

1 another event earlier that evening, and it's a  
2 industry spot for most people that's in the industry  
3 on Tuesday night go to.

4 Q Were you working at the time?

5 A No, not at the Eyebar.

6 Q Had you made plans prior to your arrival at  
7 the Eyebar that evening to meet with anyone at the  
8 Eyebar that evening?

9 MS. MORAN: Objection.

10 A No. I just was going to come through.  
11 Typical come through.

12 BY MR. TUCKER:

13 Q Do you personally know Curtis Fitzgerald?

14 A Who?

15 Q That's a good answer. I'll move on. What  
16 is your relationship with David Anthony Katrell, one  
17 of the plaintiffs in this case?

18 MS. MORAN: Objection.

19 A Now, my relationship now is we conduct  
20 business together.

21 BY MR. TUCKER:

22 Q And at the time?

page 34

1 A At the time, just a friend.

2 Q But you did know him prior to arriving at  
3 the Eyebarr that evening?

4 A Yeah.

5 Q Approximately how far -- strike that.

6 You stated that -- I believe you stated  
7 earlier in your testimony that you witnessed a  
8 conversation when Mr. Allen Iverson arrived at the  
9 Eyebarr and was headed towards the VIP section  
10 regarding being seated at the tables; is that correct?

11 A Uh-huh.

12 Q Did you actually hear the conversation?

13 A No, I didn't hear the conversation. I just,  
14 you know, seen what was going on.

15 Q It was clear to you?

16 A Yeah, yeah. He was complaining, and, I  
17 mean, the club is so small, number one, I mean, the  
18 VIP area is probably this area right here, you know.  
19 So, you know, I'm standing in the bar right here.  
20 Iverson and them are right against that wall back  
21 there. So you don't really have to hear. You can  
22 just tell the directions, and how they were trying to

page 35

1 direct people, and then I seen Tony standing in the  
2 middle section, and next thing they moved them down to  
3 the last section.

4 Q You mentioned that after Ms. Moran  
5 questioned you as to how you knew the gentleman you  
6 referred to a bodyguards for Allen Iverson were  
7 actually acting as bodyguards?

8 A Uh-huh.

9 Q You remember that? That question?

10 A Uh-huh.

11 Q Okay. And I believe you stated that you  
12 had, in your business of shooting celebrity events  
13 that you had seen some of those individuals that were  
14 with Mr. Iverson that evening at the Eyebar on prior  
15 occasions with Mr. Iverson; is that correct?

16 A Right.

17 MS. MORAN: Objection.

18 BY MR. TUCKER:

19 Q Beyond seeing them together, what basis do  
20 you have for stating that they're bodyguards of  
21 Mr. Iverson?

22 A Well, as a photographer, and I shoot

page 36

1 athletes and a lot of events, I know most of the  
2 athletes. I know most of the bodyguards. And I know  
3 if they are acting as a bodyguard that night, you  
4 know, because they don't want cameras around them, you  
5 know, they act a certain way, they do certain things.

6 Q Do you know the names or nicknames or  
7 aliases of any of the other individuals that you  
8 previously identified as bodyguards of Mr. Iverson  
9 that evening at the Eyebar?

10 A Besides J? No, I don't know any names or  
11 nicknames, no. I just know faces.

12 Q You stated, I believe, earlier that at one  
13 point, as the altercation began, you moved a little  
14 bit away towards the bar; is that correct?

15 A After the altercation.

16 Q That's correct.

17 A After, yeah.

18 Q Okay. Approximately how far were you from  
19 Mr. Iverson at that point?

20 A Wasn't that far. Because the VIP area is  
21 not that big. I would say ten feet.

22 Q Ten feet further from where you had been?

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1 A No.

2 MS. MORAN: Objection.

3 BY MR. TUCKER:

4 Q Or ten feet from Mr. Iverson?

5 A I was down a little bit, another four or  
6 five feet away, you know. So about ten feet all  
7 together.

8 Q I think I'm done, but give me one second. I  
9 just want to be sure.

10 This may have already been covered, and if  
11 it has I apologize, but did you witness anyone  
12 throwing anything that evening at the Eyebarr?

13 A No.

14 MR. TUCKER: I think that's all I have.  
15 Thank you for coming.

16 MS. MORAN: I don't have anything further.

17 You have the right to read the  
18 transcript to make sure the court reporter  
19 accurately took down what you've said. You can't  
20 change, like if you meant to say black and you  
21 realized you said blue, you can't change that, but  
22 if like you said J and she wrote down L, you could