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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

THE NICE CHILDREN OF THE WORLD (CLASS ACTION),)	CASE NO. CV 10-00049WR
)	
Plaintiffs,)	CIVIL COMPLAINT FOR:
)	
v.)	(1) CIVIL RIGHTS ACT VIOLATION: DISCRIMINATION AGAINST NICENESS;
SANTA CLAUS, a/k/a SAINT NICK, SAINT NICHOLAS, FATHER)	
CHRISTMAS, KRIS KRINGLE, PÈRE NOËL,)	(2) VIOLATION OF EQUAL PROTECTION
)	
Defendant)	
)	
)	
)	

TRANSCRIPT FROM
DEPOSITION UPON ORAL EXAMINATION OF
SANTA CLAUS
December 25, 2012, 10:00 a.m.
Law Offices of MICHEL & ASSOCIATES, P.C.
180 East Ocean Blvd., Suite 200
Long Beach, California 90802

APPEARANCES:

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**MERRY CHRISTMAS,
HAPPY HOLIDAYS
AND BEST WISHES
FOR A LITIGIOUS
NEW YEAR!**

**From the Attorneys and Staff
at**



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1 **ES:** Mr. Claus, on Christmas Eve this year, instead of toys every single child
2 got a lump of coal. Why is that?
3 **SC:** Well Mr. Scrooge, last year because I gave the naughty children coal, I
4 got sued for discrimination by the naughty kids. “Why does Santa get to judge?”
5 “Blah, blah, blah. . . .” Lord help you if you challenge a kid’s self-esteem these
6 days. So anyway, this year I gave *all* of the children coal. Now I’m getting sued
7 by the nice kids! And the EPA is claiming the coal delivery was an illegal
8 dumping of hazardous waste. I can’t win!
9 **ES:** Why not just give the naughty kids toys too?
10 **SC:** Because that’s the road to ruin. Naughty children haven’t earned toys.
11 In fact, nobody earns or appreciates Christmas anymore. Ya know, I built
12 Christmas. Not the government, me. And for centuries my work has been
13 appreciated. But now people think they’re entitled to free presents all year long.
14 They think Christmas is just another government entitlement program!
15 **ES:** Why do you say that?
16 **SC:** Think about it. The handouts, the gifts: food stamps, subsidized
17 housing, mortgage forgiveness, socialized health care, child care, never ending
18 unemployment benefits, welfare . . . the gift list goes on. People actually believe
19 that deer dung about the government building free enterprises. Christmas gets
20 lumped right in with Obama-phones! Now the elves want to unionize. The feds
21 tax the milk and cookies! Why should I bother? If the nice kids want toys, they
22 had better vote.
23 **ES:** Did you personally deliver the coal on Christmas Eve?
24 **SC:** Jingle bells no. I laid off the elves and farmed the job out to China.
25 They make almost all the toys there anyway, and without my toy order this year,
26 they appreciated the work.
27 **ES:** So where were you on Christmas Eve?
28 **SC:** Well that was quite a long night [smiling wryly]. First, me and the
29 reindeer boys smoked some mistletoe and hit the Vegas night clubs. But by 2am
30 the table service girls were asking why we weren’t out delivering presents. So
31 we hopped in the sleigh and headed to the Thailand clubs where the girls don’t
32 ask questions, so long as you keep the candy cane flowing. Ho, Ho, Ho.