

1 **IN THE UNITED STATES DISTRICT COURT**
2
3 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

4 SANTA CLAUS and THE CHILDREN) CASE NO. CV 10-00049WR
5 OF THE WORLD (CLASS ACTION),)
6 Plaintiffs,) CIVIL COMPLAINT FOR:
7) (1) BREACH OF CONTRACT
8) (2) INTENTIONAL INFLICTION
9) OF EMOTIONAL DISTRESS
10 RUDOLPH THE RED NOSED) (3) NEGLIGENCE INFLICTION
11 REINDEER, DASHER, DANCER,) OF EMOTIONAL DISTRESS
12 PRANCER, VIXEN, COMET, CUPID,) (4) UNFAIR BUSINESS
13 DONNER, BLITZEN,) PRACTICES (§7200 B & P
) CODE)
) (5) CONSPIRACY
)
 Defendants.)

14 TRANSCRIPT FROM
15 DEPOSITION UPON ORAL EXAMINATION OF
16 **RUDOLPH THE RED NOSED REINDEER**

17 April 1, 2010, 10:00 a.m.

18 Law Offices of MICHEL & ASSOCIATES, P.C.

19 180 East Ocean Blvd., Suite 200

20 Long Beach, California 90802

21 APPEARANCES:

22 Attorney For Plaintiffs:

23 C.D. Michel
24 Attorney at Law
25 MICHEL & ASSOCIATES, P.C.
26 180 E. Ocean Blvd., Suite 200
27 Long Beach, CA 90802
28 (562) 216-4444
www.michellawyers.com

Attorney For Defendants:

Ebenezer Scrooge
SCROOGE & MARLEY, INC.
Attorneys at Law
574 Pacific Avenue,
San Francisco, CA 94133
(415) 981-1849

Christine Cringle, CSR, RPR
Court Reporter

1 CDM: SO, MR. RED-NOSED-REINDEER, UH, IS THAT YOUR PROPER NAME?

2 RRNRD: CALL ME RUDOLPH, CHUCK.

3 CDM: OKAY, RUDOLPH. YOU AND THE OTHER REINDEER AT THE NORTH
4 POLE HAD A VERBAL AGREEMENT WITH SANTA CLAUS THAT ON
5 DECEMBER 24, 2009, YOU AND THE REST OF THE REINDEER WOULD . . .
6 HOW DID SANTA PUT IT . . . "GUIDE HIS SLEIGH," CORRECT?

7 RRNRD: NOT EXACTLY. HIS WORDS WERE, "RUDOLPH WITH YOUR NOSE SO
8 BRIGHT, WON'T YOU GUIDE MY SLEIGH TONIGHT?" SANTA WOULD
9 ALWAYS COME AROUND TALKING IN THOSE STUPID RHYMES LIKE ME
10 AND THE OTHER REINDEER WAS A BUNCH OF IDIOTS.

11 CDM: BUT YOU DID AGREE TO GUIDE SANTA'S SLEIGH ON CHRISTMAS EVE,
12 DIDN'T YOU? . . . RUDOLPH?

13 RRNRD: AS IF WE HAD A CHOICE. SANTA TREATED US ALL LIKE SLAVES, WE
14 ALL HATED SANTA. (SNIFFING).

15 CDM: SO THE ANSWER IS YES, YOU DID AGREE?

16 RRNRD: YEAH, YEAH, WE AGREED. BUT WE EXPECTED TO BE PAID FOR OUR
17 WORK. (SCRATCHING RED NOSE).

18 CDM: ON WHAT FACTS DID YOU BASE THAT EXPECTATION?

19 RRNRD: IT'S ONLY FAIR. WE ARE ENTITLED TO MORE THAN A CUSHY BARN
20 STALL AND THREE SQUARE MEALS A DAY. WE DESERVE RESPECT! I
21 MEAN, I'M AN INTERNATIONAL STAR FER CRYIN' OUT LOUD! (RED
22 NOSE GLOWING BRIGHTLY) SEE, THAT'S WHY I BROUGHT IN THE
23 REINDEER UNION. TO FIGHT BACK AGAINST THE OPPRESSIVE HAIRY
24 FAT MAN TRYIN' TO KEEP US REINDEER DOWN. HE WAS OUT TO GET
25 US!

26 CDM: I SEE. RUDOPH, IS IT POSSIBLE YOU WERE IMAGINING THESE THINGS?

27 RRNRD: I DON'T KNOW WHAT YOU MEAN. (SNIFFING, TWITCHING).

28 CDM: WELL, YOU RECENTLY FINISHED A MONTH LONG STAY IN A DRUG
REHABILITATION FACILITY IN HOLLYWOOD CALIFORNIA, DIDN'T
YOU?

RRNRD: HUH! (REMOVING SUNGLASSES) HOW THE HELL DO YOU KNOW THAT?

CDM: IN FACT, YOUR RED NOSE SYNDROME IS CAUSED BY YOUR ADDICTION
TO, AND CONSTANT SNORTING OF METHAMPHETAMINE, ISN'T IT SIR?

RRNRD: IT'S A BIRTH DEFECT, YOU BASTARD. (TWITCHING AND RUBBING
NOSE REPEATEDLY). SEE, THAT'S WHAT I'M TALKING ABOUT. I
GOTTA LOOK OUT FOR ME. SCREW THE MILLIONS OF CHILDREN WHO
WOKE UP AND FOUND UNTOUCHED MILK AND COOKIES, AND HEARD
THE FEDERAL EXPRESS MAN KNOCKING ON THE FRONT DOOR,
INSTEAD OF FINDING SOOTY FOOTPRINTS ON THE HEARTH. YOU WANT
ME AND THE BOYS PULLIN' SLEIGHS, SHOW US THE MONEY!

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

**From the Attorneys and Staff
at**



Environmental - Land Use - Firearms - Employment Law
Civil Litigation - Criminal Defense
562-216-4444 - www.michellawyers.com